

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**FIRST INTERIM APPLICATION OF APPLICATION OF JORDAN & ORTIZ, P.C.
FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES INCURRED FOR THE PERIOD FROM DECEMBER 1, 2022
THROUGH MAY 15, 2023**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

SUMMARY

Name Of Applicant:	Jordan & Ortiz, P.C. ("J&O")	
Applicant's Role In Case:	Co-Counsel to Debtor	
Indicate Whether This Is an Interim or Final Application:	Interim	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #105)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	01/01/2023	May 15, 2023
Total Period Covered by Any Prior Applications:	N/A	N/A
Total Amounts Awarded in All Prior Applications:	N/A	
Amount of Retainer Received in This Case:	\$146,790.16	
Total Fees Applied for in This Application and in All Prior Applications (Include Any Retainer Amounts Applied or to Be Applied):	\$243,622.50	
Total Professional Fees Requested in This Application:	\$237,172.50	
Total Professional Hours Covered by This Application:	396.10	
Average Hourly Rate for Professionals:	\$540.45	
Total Paraprofessional Fees Requested in This Application:	\$6,450.00	
Total Paraprofessional Hours Covered by This Application:	25.80	
Average Hourly Rate for Paraprofessionals:	\$193.80	
Reimbursable Expenses Sought in This Application:	\$1,067.59	
Total Amount to Be Paid to Priority Unsecured Creditors:	TBD	
Anticipated % Divided to Priority Unsecured Creditors:	TBD	
Total To Be Paid to General Unsecured Creditors:	TBD	
Anticipated % Dividend to General Unsecured Creditors:	TBD	
Date Of Confirmation Hearing	TBD	
Indicate Whether the Plan Has Been Confirmed	No	

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE CHRISTOPHER LOPEZ:

COMES NOW Jordan & Ortiz, P.C. (the “Applicant”) and files this First Interim Application (the “Application”) for interim approval of all of Applicant’s fees in the total amount of \$243,622.50 and reimbursement of all expenses totaling \$1,067.59 incurred during its employment as counsel to Alexander E. Jones (the “Debtor”) from December 1, 2022 through May 15, 2023 (the “Interim Period”). In support of this Application, the Applicant respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference from the United States District Court for the Southern District of Texas. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicate for the relief sought herein is 11 U.S.C. §§ 330 and 331, Federal Rule of Bankruptcy Procedure 2016(a), and the Local Rules of this Court.

**RETENTION OF APPLICANT AND PRIOR
COMPENSATION BACKGROUND**

3. On December 2, 2022 (the “Petition Date”), Alexander E. Jones (the “Debtor”) filed with this Court a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

4. On December 21, 2022, the Debtor filed its Application for Entry of Order Authorizing the Retention and Employment of Jordan & Ortiz, P.C. as Debtor Co-Counsel Effective as of the Petition Date [ECF #71]. On January 20, 2023, the Court entered the Retention Order of J&O as Bankruptcy Co-Counsel for the Debtor [ECF #105].

5. On January 20, 2023, the Court entered its Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for

Chapter 11 Professionals [ECF #106] (“Interim Compensation Order”) permitting Applicant to receive payment of 80% of fees and 100% of expenses. Pursuant to the Interim Compensation Order, Applicant has received periodic payments on monthly fee statements as set forth below:

<u>Invoice No.</u>	<u>Month Billed</u>	<u>Invoice Date</u>	<u>Fees</u>	<u>Expenses</u>	<u>Invoice Total</u>	<u>Amount Applied</u>	<u>Remaining Balance Due</u>
922199	December	1/27/23	\$77,362.50	\$506.65	\$77,869.15	-\$62,396.65	\$15,472.50
922213	January	2/15/23	\$28,125.00	\$102.50	\$28,227.50	-\$22,602.50	\$5,625.00
922268	February	3/2/23	\$51,205.00	\$22.44	\$51,227.44	-\$40,986.44	\$10,241.00
922376	March	4/6/23	\$46,820.00	\$120.30	\$46,940.30	-\$20,804.57	\$26,135.73
TOTAL				\$751.89	\$204,264.39	-\$146,790.16	\$57,474.23

6. This is Applicant’s First Interim Application. This Application includes fees and expenses incurred during the entire period of Applicant’s engagement from December 2, 2023 through May 15, 2023.

7. These services were rendered, and expenses incurred during Applicant’s representation of the Debtor in this case. Applicant believes such fees and expenses were reasonable, necessary, and appropriate, given the circumstances.

NATURE AND EXTEND OF LEGAL SERVICES PROVIDED

8. Applicant has provided extensive legal services to the Debtor during the five (5) months comprising the Interim Period. Attached to this Application as Exhibit “A” are records of the time keeping entries during the Interim Period generated by Applicant’s personnel who have worked on this engagement (the “Invoice”). These entries provide detailed descriptions of Applicant’s services on the Debtor’s behalf during the Interim Period.

9. The Invoices also specify each attorney who provided compensable services during the Interim Period. Specifically, the Invoices identify the person providing the service, as well as the following: (1) that person’s individual billing rate and (2) the total number of hours expended by that person.

10. Applicant has broken down its legal services rendered according to the project categories propounded by the Guidelines of the Office of the United States Trustee. The pertinent project categories are:

- Case Administration
- Asset Analysis and Recovery
- Asset Disposition
- Relief from Stay/Adequate Protection Proceedings
- Meetings of and Communications with Creditors
- Fee/Employment Applications
- Fee/Employment Objections
- Avoidance Action Analysis
- Assumption/Rejection of Leases and Contracts
- Other Contested Matters (excluding assumption/rejection motions_
- Business Operations
- Employee Benefits/Pensions
- Financing/Cash Collections
- Tax Issues
- Real Estate
- Board of Directors Matters
- Claims Administration and Objections
- Plan and Disclosure Statement (including Business Plan)
- General Bankruptcy Advice/Opinions
- Restructurings

11. The figures for the time and amounts billed per project category cover the Interim Period. The following chart generally describes the services rendered by Applicant to the Debtor in each of the relevant project categories, with more additional detail provided by in Exhibit “A”:

FEES INCURRED IN INTERIM PERIOD		
CATEGORIES	HOURS	FEES
B110 Case Administration	80.2	\$47,522.50
B120 Asset Analysis and Recovery	32.6	\$19,175.00
B130 Asset Disposition	1.1	\$660.00
B140 Relief from Stay/Adequate Protection	7.1	\$4,260.00
B150 Meetings of & Communications with Creditors	3.5	\$1,320.00
B160 Fee/Employment Applications	51.60	\$24,415.00
B170 Fee/Employment Objections	7.2	\$4,320.00
B180 Avoidance Action Analysis	5.4	\$3,240.00

B185 Assumption/Rejection of Executory Contracts	12.2	\$7,320.00
B190 Other Contested Matters	132.60	\$78,350.00
B195 Non-Working Travel	2.6	\$1,560.00
B210 Business Operations	57.40	\$34,440.00
B220 Employee Benefits/Pensions		
B230 Financing/Cash Collections		
B240 Tax Issues	0.3	\$180.00
B250 Real Estate	0.4	\$240.00
B260 Board of Directors Matters		
B310 Claims Administration and Objections	13.5	\$8,100.00
B320 Plan and Disclosure Statement	4.0	\$2,400.00
B410 General Bankruptcy Advice/Opinions	7.9	\$4,740.00
B420 Restructurings	2.3	\$1,380.00
TOTALS:	421.90	\$243,622.50

REQUEST FOR REIMBURSEMENT OF EXPENSES INCURRED

12. While providing legal services to the Debtor, Applicant incurred certain reasonable and necessary out-of-pocket expenses while representing the Debtor. A detailed record of these expenses is included in the Invoice. Expenses were billed at actual cost. Applicant does not charge for long distance telephone, outgoing faxes, and in-house charges for copying and postage. Outside copies and postage are billed the rate by the vendor. Applicant has made no request for general overhead expenses.

13. Applicant's post-petition expenses are separated into relevant categories as set forth in the table below, with additional detail set forth in Exhibit "A".

EXPENSE	AMOUNT
Court Fees	\$650.88
Printing	\$7.30
Research	\$68.52
Meals (Out of Town Attys)	\$325.89
Parking	\$15.00
TOTAL	\$1,067.59

14. Applicant believes that expense request is reasonable, appropriate, and necessary and requests that the Court grant it reimbursement for \$1,067.59 in reimbursable expenses incurred during the Interim Period by Applicant on the Debtor's behalf.

FACTORS AFFECTING COMPENSATION

15. Courts recognize that factors other than the number of hours spent and the hourly rate normally charged may be considered in fixing the amount of reasonable attorneys' fees to be awarded in a bankruptcy proceeding. Such factors are set forth in, *In re First Colonial Corporation of America*, 544 F.2d 1291 (5th Cir. 1977) and *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974). One or more of these Johnson factors may serve as a basis for enhancing the hourly rate which might otherwise be allowed. *Wolf v. Frank*, 555 F.2d 1213 (5th Cir. 1987). The Johnson factors are discussed in further detail below.

A. Time and Labor Required. Exhibit A lists in detail all the work performed for which compensation is sought. Time entries are broken out by project categories. The date the services were rendered, the individual performing such services, a description of the services, and the time expended are all detailed. Applicant believes that such detail establishes that its request for compensation is reasonable. All the services specified were actual and necessary for the Debtor to perform its statutory duties.

B. Novelty and Difficulty. As set forth in greater detail in Exhibit A, this case has involved a number of challenging legal and operational issues. The pending Sandy Hook Litigation presented unique issues and hurdles to overcome to preserve the Debtor's operations and develop a path towards reorganization. Applicant has faced a faced several difficult and complex legal issues, including:

- Work on transition of new counsel and furnishing documents and past strategy issues and problems to aid new counsel to engage and to assist selected Financial Advisors to engage;
- Work on financial information to aid in preparation of statements and schedules involving bank accounts, trust accounts, terminating the 2022 Appeal Trust and dealing with the 2022 Litigation Trust; activities with PQPR and its counsel; asset locations and claims history and analysis;
- Advising Debtor regarding issues of full disclosures; issues of financial transactions disclosures; issues of historical statements to be corrected as misstatements of counsel for Sandy Hook Plaintiffs and dealing with contributions of debtor to FSS to offset sharing of legal fees and enforcement of the statutory and contractual indemnification of defense costs for employment related litigation (primarily Sandy Hook Plaintiffs);
- Work on outline for Judge Isgur mediation and to aid in response and answer to the two Adversary Proceedings by Sandy Hook Plaintiffs, including whether the claims are personal injury tort claims under 28 U.S.C. § 157(d); nature of state court standard of proof (preponderance or clear and convincing); nature of default and how mis-applied to causation and damages; multiple trial and appellate issues; work with co-counsel in preparing outline of defenses and research to support defenses; assisting in obtaining appellate records from appellate counsel;
- Advising the Debtor with respect to the Tort Committee Motion in FSS to revoke the Subchapter V chapter 11 election and the uncertainty of issues surrounding Subchapter V of chapter 11 and impact on Debtor's case and the various 2004 notices for document examination and debtor examination and advice regarding the Sub Chapter V Trustee's report and need for clarification of supplemental matters;
- Prepare and publish the response to the Texas Plaintiffs' claim of Debtor's purported misstatements in regard to trial testimony and trial conversations with Texas Sandy Hook Plaintiffs, prepare video for publication and furnish video to news media for airing, including Piers Morgan for airing.
- Coordinating with the financial advisors ("FAs") to supply history, data, and information to aid in preparation of both schedules and statements as well as financial disclosures from the Debtor incomplete books and records to distill information necessary to complete disclosures for both bankruptcy court and the mediation;
- Work on issues of salary reduction and issues of employment agreement to deal with the allowance of indemnification provided therein, outside work as allowed therein, and provisions for exemption of salary to annuities; review and comment on proposed employment agreement and indemnification;

- Work on presentation to bankruptcy court regarding prior mis-statements, including allegation of \$50M+ in draws from 2020 or 2018 and prepare finished version of chart illustrating salary of approximately \$2.0M to \$2.2M from fiscal 2014 to 2022; chart showing contributions by Debtor to FSS in 2022 of approximately \$10M to support the continued ability of FSS to operate, including debtors use of a majority of \$3.2M in homestead sale proceeds contributed to FSS and use of \$8M in Bitcoin contributions to debtors Bitcoin wallet paid over to FSS, in addition to financing of consigned Platinum products to allow FSS sales to continue and contributions and advance to FSS initially to ship large backlog of paid for shipments as a result of FSS CRO understatement in his original budget for re-ordering and shipping of products;
- Work with Debtor in dealings with third parties and issues including ESG and Midmountain issues, including work on documents and evidence of full and timely disclosures of activities or potential activities and related issues;
- Work with the Debtor and co-counsel in addressing the numerous emergencies arising related to the Debtor's daily business operations, fulfillment of orders, procurement of new products, management of inventory, and analyzing with the replacement CRO financial records and projections to determine viable business plans in the context of the chapter 11 case.

C. Skill Required to Perform the Legal Services Properly. Bankruptcy is a specialized area of federal practice, requiring knowledge of the Bankruptcy Code and other related state and federal statutes and precedent. It also requires a working knowledge of a number of other areas of complicated legal issues, many of which were on an expedited basis and required a substantial amount of skill. The Court is familiar with the extensive emergency hearings, from the first-day motions to the motions to approve and modify the use of FSS cash collateral to the motions for relief from stay and various other motions.

D. Customary Fee. The hourly rates for each professional are summarized above and in **Exhibit "A"** filed in support of this Application. The rates for bankruptcy attorneys reflect the usual rates charged by the Applicant. The hourly rates requested by Applicant compare favorably with average costs for similar legal services provided by law firms representing debtors in chapter

11 cases involving the level of sophistication required in this case. Applicant's rates are significantly lower than the rates charged by other professionals who have appeared in this case.

E. Whether the Fee is Fixed or Contingent. Applicant's fee is neither fixed nor contingent, other than the contingency of court-allowance and available assets to pay professionals. It is based upon the actual total number of hours worked plus the actual costs incurred.

F. Amount Involved and Results Obtained. Exhibit "A" details Applicant's work during the Interim Period. The dates such services were rendered, the individual performing such services, descriptions of the services and the time expended are all detailed. Applicant believes that such information establishes that its requested compensation is reasonable.

G. Experience, Reputation, and Ability of the Attorneys. Mr. Jordan has regularly appeared in significant representations over many years, including bankruptcy cases throughout Texas and the United States and has confirmed plans reorganizing over \$6 billion in claims. Mr. Jordan has fifty years of experience focusing on bankruptcy matters and has a positive reputation in the business and legal community. He is Board Certified in Business Bankruptcy Law by both the State of Texas and the American Bankruptcy Institute, from the first year each respective board certification was offered to Texas counsel. He is recognized among the best lawyers in Texas by Best Lawyers every year since 1990, AV rated every year since 1978 and by Texas Monthly "Super Lawyer" in business bankruptcy for each year published beginning in 2003.

H. "Undesirability" of Case. Representation of the Debtor in this chapter 11 case was undesirable. The Debtor's is a nationally known, and controversial figure and the subject of public ire, including frequent threats to his and his family safety. Further, given the contentious

nature of the Sandy Hook Litigation both by lawyers and the courts and the treatment of the underlying claims, even matters that should be easily agreed are fiercely contested.

I. Awards in Similar Cases. Based on Applicant's experience in the Texas legal market and throughout the country, Applicant's fees are lower than the fees allowed to similarly qualified counsel in proceedings of similar scope for the services rendered and results obtained.

RESULTS OBTAINED

16. Applicant offers the following synopsis of its significant efforts on behalf of the Debtor to date:

a. Case Administration – Applicant aided co-counsel and the FAs in building the base of information and guiding the Debtor through the administrative aspects of a bankruptcy case. Working with the Debtor and co-counsel, Applicant has overcome obstacles presented by the state of the Debtor's books and records and dealing with significant mis-information and mis-interpretation of information, to insure timely and most importantly, accurate compliance with the fiduciary duties of a debtor, the full disclosure of the debtors past and current financial and personal transactions, his monthly needs in light of his reduced salary and significant contributions to FSS to allow its continued operations and meeting its operating reporting requirements and obtained necessary Court approval to ensure post-bankruptcy continuity of the debtor's and FSS's operations. The work toward a potential resolution of the Sandy Hook Judgment Claims and the work to assist the appellate lawyers in understanding the bankruptcy court's claims objection process, claims estimation process, the impact of discovery default judgments and the application by the trial courts, rulings permitting, for example, double hearsay as well as testimony by experts testifying to a jury that the Debtors' combined net worth exceeded \$250,000,000, and the resulting actual and punitive damages resulting.

b. **Experience in Fee/Employment Applications and Objections.**

Applicant has prosecuted in bankruptcy cases applications to employ multiple special counsel necessary to defense of state court lawsuits and to prosecute appeals of the resulting judgments, many of those applications were contested. In addition to applications to retain professionals for the Debtor, numerous applications have been filed for the retention of professionals including in the related FSS bankruptcy case.

c. **Assumption and Rejection of Leases and Contract** – Applicant has filed

and prosecuted multiple motions to reject certain contracts and leases and, in this case, reviewed and commented on the several rejection motions for relationships or services no longer necessary to the Debtor's operations. Applicant has also analyzed, along with co-counsel, other contracts and leases and attended to termination under the terms of the contracts.

d. **Business Operations** – Applicant has assisted the Debtor in evaluating

existing and prospective business opportunities with counterparties regarding inventory purchasing, consignment sales to FSS, financing of product fulfillment at FSS, as well as issues of credit card processing, among others. In addition, upon disqualification of the initial CRO, Debtor had no management in place. Applicant was instrumental in stabilizing the Debtor's operations until a replacement CRO could be identified and retained.

e. **Financing** - These services primarily relate to the funding of the initial

operations of FSS in its bankruptcy case; the funding of the \$1 million sanction awarded to the Texas Plaintiffs in order to be allowed to go to trial and the strategy concerning same; Debtor's requests for salary reinstatement through use of the FSS cash collateral and contributions addressing issues in the Debtor's fulfillment of orders to allow its continued operation. As the result of these contributions of funds and consignment inventor by the Debtor FSS was able to

obtain use of cash collateral on an interim basis and continuing through nine interim cash collateral orders.

f. **Litigation** – The services provided by Applicant to the Debtor related to the mediation and appeals of the Sandy Hook Litigation and the work to prepare for both mediation and actual defense of the claims filed significant work toward the actual defense of the claims, the effort to settle the Sandy Hook Judgment and determine the claims analysis for both settlement purposes, and if unsuccessful, for objections to the Sandy Hook claims, the appeal positions taken by the appellate lawyers as relates to the bankruptcy claims objections, and work toward defeating the claims of any collateral estoppel of the Sandy Hook judgments to allow determination in the bankruptcy court or estimation as the case may be.

g. **Meetings and Communications with Creditors** – Applicant has assisted in co-counsel's lead in communication with all constituents as well as the mediator in the regular and frequent communications with the Sub-Chapter V Trustee and counsel, the U.S. Trustee's office, as well as counsel for PQPR, counsel for Free Speech Systems and counsel for the Sandy Hook and Connecticut Plaintiffs.

h. **Plan**—The Plan has not been finalized but part of the mediation process and will be likely promptly filed following the outcome of the mediation.

17. Other bankruptcy practitioners involved in cases of comparable size and complexity regularly charge hourly rates ranging from \$675.00 to over \$800 per hour. Applicant's approved hourly rate at \$600 in this case is meaningfully lower than the lowest rate in that range. Based upon the services described and the results obtained, the fees requested in this Application are fair and reasonable.

CONCLUSION

18. Pursuant to this Interim Application, Applicant seeks approval on an interim basis of (i) compensation of fees in the total sum of \$243,622.50 and (ii) reimbursement of expenses in the total sum of \$1,067.59. Applicant requests interim approval and payment of all approved, accrued, and unpaid fees and expenses for the Interim Period.

PRAYER

19. WHEREFORE, Applicant respectfully prays that the Court enter an order (i) approving this Interim Application; (ii) allowing, on an interim basis, the reasonable attorney fees and expenses claimed herein as allowed administrative expenses of the Debtor's estate; (iii) authorizing and directing the Debtor to promptly pay the remaining balance of approved amounts to Applicant; and (iv) granting such other and further relief to which Applicant is justly entitled.

Respectfully submitted May 29, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

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CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on May 29, 2023, true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system as follows.

Raymond William Battaglia on behalf of Creditor Free Speech Systems, LLC
rbattagliaw@outlook.com, rwbresolve@gmail.com

Marty L Brimmage on behalf of Creditors Carlee Soto Parisi, Carlos M Soto, Creditor Committee Official Committee Of Unsecured Creditors, David Wheeler, Donna Soto, Francine Wheeler, Ian Hockley, Jacqueline Barden, Jennifer Hensel, Jillian Soto-Marino, Leonard Pozner, Marcel Fontaine, Mark Barden, Neil Heslin, Nicole Hockley, Robert Parker, Scarlett Lewis, Veronique De La Rosa, William Aldenberg, William Sherlach
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Jennifer Jaye Hardy on behalf of Creditors Leonard Pozner, Marcel Fontaine, Neil Heslin, Scarlett Lewis, Veronique De La Rosa
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John D Malone on behalf of Creditor Security Bank of Texas
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Jarrold B. Martin on behalf of Creditors Leonard Pozner, Marcel Fontaine, Neil Heslin, Scarlett Lewis, Veronique De La Rosa

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Ha Minh Nguyen on behalf of U.S. Trustee US Trustee

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Johnie J Patterson on behalf of Creditor Elevated Solutions Group, LLC

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Bradley J. Reeves on behalf of Creditor Reeves Law, PLLC

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Stephen A Roberts on behalf of Interested Party David Ross Jones

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Jayson B. Ruff on behalf of U.S. Trustee US Trustee

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Jason Starks on behalf of Creditor Travis County

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Christina Walton Stephenson on behalf of Debtor Alexander E. Jones

Crissie.Stephenson@crowedunlevy.com, elisa.weaver@crowedunlevy.com; ecf@crowedunlevy.com

US Trustee

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Yoshie Valadez on behalf of Creditor Bank of America N.A.

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/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”
FEE STATEMENTS

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 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 January 27, 2023
 Account No: 5481-002000M
 Statement No: 922199

Bankruptcy

					Hours
12/02/2022	CRM	B110	A103	Draft/revise notice of appearance for Shelby Jordan as counsel for Alex Jones and file same.	0.50
	SAJ	B110	A108	Conference with C&D on all pending issues of filing and emails discussing filing and review final documents and office conference with client for final approval (3.4); telephone conference with client and in office regarding filing approval (1.2); telephone conference with client and in office regarding filing and filing statements and schedules (0.2); work on statement to employees regarding Ch 11 filing (0.3); work on audience statement for TAJ show (0.1); discuss status of filing of notice an initial status conference and notices (work on matrix issues and parties in interest) with client appearing (0.2); work on gathering all documents, scheduling Monday for meeting with CRO and parties having books and records (0.4); telephone meeting with Bob Roe (0.3); work on documents for Monday schedule for meeting with co-counsel in Austin (0.3).	6.20
	SAJ	B190	A107	Conference with Pattis regarding status of judgment and appellate timing (0.6); receive and review new Conn pleadings and emails to and from Texas trial counsel (0.4); work on conflicts of law and conflicts of threatened sua sponte seizure over parties not before the Conn court (Jones affiliates as "property of the estate") (0.8); work on notice of auto stay regarding entry of agreed lift stay to coordinate with FSS and its agreed lift stay to coordinate appellate timelines and deadlines (0.3).	2.10
12/03/2022	SAJ	B110	A103	Work on draft V1 and V2 of Debtor's Initial Status Report (2.2); emails to new CRO, co-counsel regarding Monday schedule and meeting arranged for preparation of accounting and schedules and for initial status report and initial status conference with Court (0.3); review recent new quotes from Plaintiffs' counsel for appeal issues (0.2); begin to work on issues of debtor pre-petition draws and asset schedules for net worth (2.1).	4.80

JONES, ALEX

January 27, 2023

Account No: 5481-002000M

Statement No: 922199

Bankruptcy

					Hours
12/04/2022	SAJ	B410	A106	Meeting with client to work on issues regarding all bank accounts and meeting with PQPR to understand access and working relationship to all accounts (1.0); call to ESG regarding status and timing of post-petition work (0.2); work on issues of DIP conduct and accounting with client (0.4)	1.60
	SAJ	B120	A104	Continue to work on organizing assets and affiliate entities and affiliate entities for new CRO and gather information on all affiliate entities transactions and compare to discovery/deposition review to assure thoroughness.	2.00
	SAJ	B310	A103	Work on claims bar date and circulate to co-counsel with proposed order (1.3); work on claims analysis issues and plan confirmation issues (0.6); estimation and claims bar dates process and procedures (0.2); begin work on status report for court on administrative claims of debtor due from FSS (0.2).	2.30
	SAJ	B210	A108	Conference with PQPR regarding all affiliate and related bank accounts and business records.	0.60
12/05/2022	SAJ	B110	A107	Conference with co-counsel on all asset issues and accounting issues involving schedules and statements of affairs, listing of assets including opportunities (1.6); download multiple files and discuss with CRO team regarding initial accounting and analysis of actual net worth, schedules or draws (checking for actual business expenses designated as a draw (0.2); prepare edits to initial status conference reports and circulate (0.3); work on demonstrative of draws and average draws per year (0.3).	2.40
	SAJ	B210	A106	Conference with client regarding bank accounts (0.4); call and arrange appointment and conference call with Bob Roe regarding meeting schedule tomorrow and accounting issues to meet with CRO team (0.3)	0.70
	SAJ	B410	A106	Conference with client regarding all current operations and issues of DIP and how to deal with post-petition ESG agency and accomplish regarding past, current and future investment in inventory purchases for consignment to FSS (1.2); how to organize bank accounts and how to insure accurate inventory for storage rooms with property of the estate (0.3); work on scheduling inventory and appraisal issues and set up meeting with Debtor and new CRO;(0.5)	2.00
	SAJ	B185	A107	Conference with co-counsel regarding salary contract, indemnity and motion to assume or reject executory contracts including employment agreement evidence (0.2); conference with Battaglia regarding salary budget expenses adjustment and timing and indemnity agreement (0.2).	0.40
	SAJ	B190	A103	Work on pleading for estimation of claims (0.4); prepare and	

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				Hours
			circulate memo in connection with issues of discharge (0.2).	0.60
	SAJ	B190	A104 Work on a respond to suggestion of bankruptcy filed in Travis County and pull research and update holding such filing not an "appearance" in the removed case (0.5); pull research and send to parties and Plaintiffs' counsel that notice only is required to invoke the automatic stay (0.6); conference with Andino Reynal regarding his appellate issues (0.3).	1.40
	SAJ	B185	A106 Conference with client regarding status of expectancy.	0.40
12/06/2022	SAJ	B110	A106 Meeting with client and CRO and meeting with co-counsel and CRO and conference with client in office regarding handling and accounting for all cash, handling payment of bills and accurate reporting of all credit card charges (2.4); conf with client re: handling contracts income and new contract opportunities (0.6); conference with Bob Roe regarding historical operations, historical records and other accounting issues (0.7); review and circulate email and memo on Rule 2019(b) BRP to require all creditor counsel representing more than one client to file verified statement (0.2)	3.90
	SAJ	B120	A103 Work on debtor asset summaries and conference with CRO regarding appraisals to the Ranch and Lake Travis house.	0.20
	SAJ	B140	A107 Conference with co-counsel regarding motion for relief from stay regarding FSS stay through entry of judgment and impact on creating two appeal proceedings.	0.50
	SAJ	B185	A104 Work on issues of default by FSS and enforcement of Debtor's employment contract with FSS (0.4); review draft for edits; conference with debtor (0.4).	0.80
	SAJ	B190	A103 Circulate detailed memo on 5th Circuit case regarding final judgments only and pull authority that a Federal court case filing included a bankruptcy or a contested matter objection to a claim or seeking estimation of claims and determining discharge actions (1.7). Begin outline for mediation statement including these points (1.0).	2.70
	SAJ	B190	A104 Work on and research appellate issues for state court stay issues (0.4); circulate to co counsel along with research on filing suggestion of bankruptcy and non-appearance in case (0.3); pull and forward case for violation of auto stay for any non-ministerial action by court or parties and liability of counsel in removal (0.4).	1.10
12/07/2022	CRM	B190	A109 Prepare, appear (remotely) and attend status conference.	0.60
	SAJ	B110	A109 Houston meeting with Liz Freeman and meeting with co-counsel to prepare and attend hearing on initial status	

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Bankruptcy

				Hours
			conference (3.0); conference with client regarding status report (no travel included) (0.2); post hearing telephone conference with client re: hearing outcome (0.1).	3.30
	SAJ	B310	A104 Research and memo preparation regarding standard of proof and mediation statement inclusion (1.4); analysis of each cause of action in Texas and Conn compensatory damages and default for each of Texas and Conn punitive damages standard of proof (1.5); impact of limitations on standard of proof (0.2).	3.10
	SAJ	B195	A109 Trip to Houston to attend status conference (billed at half).	2.60
12/08/2022	SAJ	B110	A106 Conference with client regarding status of donations accounts and assure account handling and deposit in DIP account.	0.70
	SAJ	B120	A104 Continue to review of documents for schedules and statements (0.8); emails to new CRO and two meeting with debtor to organize and document various assets and asset opportunities with "brand" and with affiliates (1.2).	2.00
	SAJ	B140	A107 Conference with Battaglia and work on issues of appeal and entry of judgments coordinated between the two debtors to avoid two-track appeal in same case.	0.80
	SAJ	B190	A107 Conference with Norm Pattis regarding status of appeal issues for Conn appeal and status of retainer and costs to be incurred.	0.40
	SAJ	B110	A107 Conference with Norm Pattis regarding status of contribution account and location and turn over to estate.	0.70
	SAJ	B210	A103 Work on DIP budget issues and stop charges by FSS to DIP account for internet access.	0.70
	SAJ	B110	A107 Email to debtor CRO (0.2); call and emails to co-counsel regarding pull down hearing on salary and prepare for hearings on 16th and 19th and 341 meeting (0.5).	0.70
12/09/2022	SAJ	B110	A107 Telephone conference with co-counsel to prepare for next week work by CRO with debtor (0.8); memo on discussion re: Friday hearing and planning, strategy, zoom and related issues (0.5).	1.30
	SAJ	B120	A104 Work on 2017 to current asset and asset opportunities-transactions for valuation and scheduling.	1.20
	SAJ	B310	A103 Prepare V1 mediation memo on claims estimation/dischargeability and full review and determination of non-tort "claims" (Defamation and bankruptcy court's jurisdiction to determine) and intentional infliction as a personal injury claim and work on mediation statement V8 (3.6).	3.60

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					Hours
	SAJ	B190	A103	Work on V9 of mediation statement and summary of BR strategy; circulate.	2.40
12/10/2022	SAJ	B190	A103	Work on V10 of mediation statement section on summary and strategy of debtor's Chapter 11 case (2.0); incorporate edits and changes from co-counsel (0.2).	2.20
12/12/2022	SAJ	B110	A106	Conference with client regarding week scheduling, meeting regarding additional information on assets and transactions (1.0); review of last two depositions referencing assets (.6).	1.60
	SAJ	B110	A107	Conference with Steve Lemmon regarding access to PQPR information (.3); conference with co-counsel regarding same (.4).	0.70
	SAJ	B190	A103	Continue to work on V10 mediation statement and issues to be discussed with mediator (3.2); work on scheduling mediator call and zoom regarding going forward after Plaintiffs mediator meeting and request for conference call with mediator and topics (0.5).	3.70
12/13/2022	SAJ	B120	A107	Conference with co-counsel regarding meeting with debtor and asset analysis (0.5); work on recovery of deposition of debtor regarding testimony about assets, property, affiliates. (0.5)	1.00
	SAJ	B190	A103	Continue to work on mediation statement (2.2); conference with Pattis regarding depositions and current status of issues (0.3); continue work on research mediation research and schedule zoom conference with mediator and emails to Ray Battaglia and co-counsel regarding timing and attendance (0.8); prep and attend zoom conference with mediator (0.8).	4.10
12/14/2022	SAJ	B110	A106	Conference with client regarding hacking and disclosures and discuss with client and Battaglia seeking bankruptcy court relief for hacked and stolen confidential information (0.6); determine damages, if any, by third parties attempting de-platforming as a violation of the automatic stay (0.8).	0.80
	SAJ	B110	A107	Conference with co-counsel and conference with consignment lender rep on timing of payment (0.5); conference with FSS counsel and request conference with FSS CRO (0.3).	0.80
	SAJ	B190	A107	Discuss with co-counsel and debtor the appeal strategy and modification to allow appeals to proceed.	0.30
	SAJ	B120	A107	Meeting and discussions continued efforts at asset and liability discovery analysis with co-counsel, financial advisor, debtor.	1.70
	SAJ	B150	A104	Review appointment of creditors committee and compare to memo of Conn v Texas Plaintiffs (circulate).	0.20
	SAJ	B150	A106	Conference with client on committee function, make-up and	

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			representation.	Hours 0.20
	SAJ	B185	A103 Work on FSS contracts regarding \$900,000 due debtor from FSS postpetition for the purchase of product to be sold (0.6); work on contracts potential for celebrity endorsements and celebrity endorsements (0.3).	0.90
	SAJ	B185	A107 Conference with ESG (.4); review details for third party promoted products (.5).	0.90
	SAJ	B190	A103 Continue to work on mediation statement V11 and prepare initial statement for service on mediator.	2.20
12/15/2022	SAJ	B140	A107 Review and comment on order for lift stay agreement with Akin Gump to coordinate entry of judgments for appeal purposes (0.4); email to Andino regarding attorneys fees and appeals and employment (0.2).	0.60
	SAJ	B320	A104 Review and comment on cash collateral and issues of executory contract concerns (0.4); send demonstrative on potential post-petition contracts including celebrity endorsement income and reporting all sources of income in MOR and to estate (0.6).	1.00
	SAJ	B190	A103 Draft/revise summary for mediation after conference with mediator (1.2); work on summary "driving issue" in mediation (0.3); secondary issue of claims objections (0.2); and other mediation issues (0.3); begin update to V11 mediation statement (0.4).	2.40
12/16/2022	SAJ	B110	A104 Review/analyze and comment on witness list and related exhibits including new budget and does not deal with salary.	1.00
	SAJ	B185	A103 Draft/revise and circulate demonstrative on post petition contract negotiations and request a copy of Celebrity Endorsement contract.	1.00
	SAJ	B160	A107 Notice to Norm Pattis (Conn appeal counsel) that fee is likely to be hourly cc: Driver and conference with Pattis.	0.40
	AO	B110	A105 Conference with Shelby Jordan regarding preparation for hearing on 12/19 in case Jordan cannot attend.	0.60
12/19/2022	SAJ	B410	A106 Meeting with client and co-counsel to work on all outstanding administrative and reporting issues dealing with new financial advisors requests (1.0); discuss and review the MOR filings by FSS and discuss the confusing issues created by the delayed accounting and systems of FSS CRO and discuss issues with the FSS CRO Patrick McGill (0.4); call from Ray Battaglia regarding cash collateral in FSS and discuss with client the continued refusal to restore the contract rate salary and alternatives (0.4).	1.80

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				Hours
	SAJ	B140	A101 Prepare with client and co-counsel regarding hearings on cash collateral motion and prepare debtor on responses to Court's questions, if nay, at hearing.	2.60
	SAJ	B140	A106 Meeting with client and review issue of relief from stay, payment of percent of costs of appeal by this estate and by FSS and discuss reference to appellate counsel and restrictions on fees and alternatives if cash flow cannot be maintained.	1.00
	SAJ	B160	A103 Work on Jordan & Ortiz application to employ and prepare for filing.	0.80
	SAJ	B190	A103 Finish intro of V12 mediation statement and circulate to co-counsel.	0.80
	AO	B110	A105 Attend hearings and prepare memo for circulation to debtor and counsel.	1.50
	SAJ	B110	A103 Prepare the initial debtor's conference form and circulate (0.6); prepare and attended with debtor and co-counsel the initial debtor's conference (0.6)	1.20
12/20/2022	SAJ	B210	A107 Conference regarding FSS and operations for Oct Nov 2022 and discussion of operations and disclosures of extremely confidential information in morning debtor conference regarding impact of confidential disclosures and impact of Debtor's estate by de-platforming (2.0); work on status of FSS and its CRO and decisions to delay operations issues and employment agreement (0.4); requested accounting budgeting of FSS for January and February (0.2).	2.60
	SAJ	B160	A103 Prepare final draft of Fee Application and circulate (1.2); work on interim order for fee payments (1.1).	2.30
	SAJ	B180	A107 Request FSS action to seek preference payments and issues to be raised in mediation (0.5); discuss and determine whether funding of cash by Jones pre-petition as basis of preference by Jones estate (0.7); research punitive sanctions as a preference payment (0.5).	1.70
12/21/2022	CRM	B160	A103 Review and revise Shelby Jordan fee application, order and declaration; file and serve same.	1.00
	SAJ	B210	A106 Review/analyze email from Zensky regarding donations and email to debtor forwarding Zensky email and work on summary (0.7); conference with debtor and emails to co-counsel on information gathering and outline of response (0.3); review with Pattis donation accounts and accounting (0.2).	1.20

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				Hours
SAJ	B160	A103	Finalize and file retention application for Jordan & Ortiz.	0.80
SAJ	B160	A106	Conference with client regarding interim payments and income funding (0.4); emails to co-counsel to prepare FSS form of interim compensation and send word version (0.6).	1.00
SAJ	B185	A101	Work on preparation for hearing on summary of reasons for executory employment contract of Jones with FSS (1.2); send full financial summary of pre-payments by Jones of FSS expenses without reimbursements and work on issues of Jones administrative expense claims of FSS (1.0); send memo on "indemnity" set out in employment agreement and issue of statutory right to indemnity due by FSS (0.2).	2.40
SAJ	B190	A103	Work on mediation issues outline for inclusion in mediation statement V13.	1.30
SAJ	B310	A107	Conference with co-counsel regarding hearing conflict on salary issues and other client mediation (0.7); prepare, research and forward outline of proof on debtor background payments and administrative claims due by FSS to Jones including travel, advances for Conn trial, attorneys retainer for FSS and prior counsel to Info-W, InfoW-Health, Prison Planet and for shipment and fulfillment and consignment purchases, etc. and research on right to indemnity from FSS (2.0).	2.70
SAJ	B110	A106	Review PQPR sales reconciliation and discuss with client issues of accounting and reporting (0.6); discuss status of consignment of Platinum products to be sold by FSS and how disbursements of those proceeds will be handled including ESG agent handling (0.7).	1.30
SAJ	B110	A104	Email and review the notice of hearing docket 76 for assumption/rejection of employment agreement.	0.30
SAJ	B160	A103	Complete declaration of disclosure of fees paid in year before bankruptcy and work on final copies of fee application and final draft of interim fee payments and filing (1.10).	1.10
SAJ	B190	A107	Conference with Norm Pattis regarding appellate points, status of appeal issues and status of notice of appeal post judgment (0.4); edits and thoughts sent to Pattis (0.6).	1.00
SAJ	B190	A105	Conference with client regarding appeal and Texas appellate issues (0.6); receive and review memorandum of decision entered by Judge Belis in Connecticut and discuss with debtor (0.4).	1.00
SAJ	B190	A107	Email to co-counsel regarding Rule 2004 examination and Zensky demands and regarding Rule 2004 notice (0.4); gather and forward to co-counsel the documents previously furnished to the Sub-V Trustee voluntarily marked "Mediation Privileged"	

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					Hours
			(1.5)		1.80
12/27/2022	SAJ	B210	A107	Zoom conference call with DIP lender attorney and co-counsel (0.7); review and discuss mediation ordered and the extension of FSS dischargeability deadline and both documents application to this debtor (0.5).	1.20
	SAJ	B410	A107	Email and conference with co-counsel regarding publication of deposition testimony by Plaintiffs and request of Committee Counsel to assist in pulling down.	0.30
	SAJ	B120	A104	Review/analyze and verify return of quitclaim deeds and title to Jones of the Travis Lake House and the Guadalupe County 124 Acres from the 2022 appeal bond trust (0.2); forward to financial officers for inclusion in schedules and verify filing in the deed records for return of assets to the estate (0.4).	0.60
	SAJ	B160	A107	Review email from co-counsel regarding UST question about J&O representation of any parties in interest to Jones "in other matters" and email to co-counsel replying "none" in any matter.	0.20
	SAJ	B190	A107	Email and conference with co-counsel on mediation order that must be approved by Plaintiffs counsel.	0.30
	SAJ	B310	A104	Review/analyze status of loan and debtor's guaranty with security state bank of crawford (0.2); conference with client (0.1); request copies of loan documents and location of loan collateral (Winnebago travel vehicle) (0.1).	0.40
12/28/2022	SAJ	B110	A103	Work on outline of issues to consider in salary motion and evidence (0.4); work on issue of confidentiality to avoid matters of production sent to the news and press (0.3); email to and from co-counsel regarding need for confidentiality agreement in response to David Zensky (0.3).	1.00
	SAJ	B410	A104	Review/analyze order on FSS extension of the deadline for dischargeability (0.3); send email to co-counsel regarding preparation for V13 outline of all issues for mediation statement (0.3).	0.50
	SAJ	B160	A107	Research and respond to UST questions about related party of affiliate representation (response, none) review IOLTA and source and use, have conflicts check re-run.	0.70
	SAJ	B180	A107	Emails to co-counsel and Battaglia regarding need to consider bringing the avoidance actions.	0.60
	SAJ	B190	A104	Review/analyze two orders sent by Akin Gump on mediation send edit thoughts to co-counsel (0.3); work on dischargeability research section for mediation statement V14 (0.7). Total Time Billed 1.00	1.00

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Hours

12/30/2022	SAJ	B210	A107	Conference with co-counsel update and discussion of all pending matters (0.4); email to debtor and call to debtor regarding email questions raised (0.6).	1.00	
				For Current Services Rendered	130.60	77,362.50

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
SHELBY A. JORDAN	Partners	126.40	\$600.00	\$75,840.00
ANTONIO ORTIZ	Partners	2.10	475.00	997.50
CHRYSTAL MADDEN	Paralegals	2.10	250.00	525.00

12/30/2022	B110	E111	12/5/22 - The Grove - Working lunch for Crissie Stephenson, Vickie Driver, Harold Kessler, Allison Gerard	126.04
12/30/2022	B110	E111	12/6/22 - Panera - Working lunch for Crissie Stephenson, Vickie Driver, Harold Kessler, Bob Schleizer, Shelby Jordan, Allison Gerard	199.85
12/31/2022	B110	E112	CSC - Recording Fees for Travis Co and Guadalupe County	91.98
12/31/2022	B110	E124	Parking - Hearing in Travis Co	15.00
12/31/2022	B110	E132	Bankruptcy Photocopies (.20 per page)	7.30
12/31/2022	B110	E124	Computer Research - Lexis	66.48
			Total Expenses	506.65
			Total Current Work	77,869.15
			Balance Due	<u>\$77,869.15</u>

Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	20742.50	506.65
B120 Asset Analysis and Recovery	5220.00	0.00
B140 Relief from Stay/Adequate Protection Proceedings	3300.00	0.00
B150 Meetings of and Communications with Creditors	240.00	0.00
B160 Fee/Employment Applications	4630.00	0.00
B180 Avoidance Action Analysis	1380.00	0.00
B185 Assumption/Rejection of Leases and Contracts	4080.00	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	19830.00	0.00
B195 Non-Working Travel	1560.00	0.00
B100 Administration	60,982.50	506.65
B210 Business Operations	4800.00	0.00
B200 Operations	4,800.00	0.00
B310 Claims Administration and Objections	7260.00	0.00
B320 Plan and Disclosure Statement (including Business Plan)	600.00	0.00
B300 Claims and Plan	7,860.00	0.00

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		<u>Fees</u>	<u>Expenses</u>
B410	General Bankruptcy Advice/Opinions	3720.00	0.00
B400	Bankruptcy-Related Advice	3,720.00	0.00

Your trust account #1 balance is

Opening Balance	\$146,790.16
Closing Balance	\$146,790.16

The entry N/C signifies time spent for which there will be no charge.

JORDAN L. ORTIZ, ESQ.
 500 N. SHORELINE BLVD, SUITE 900
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

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 alexejones1777@gmail.com

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PREVIOUS BALANCE						\$77,869.15
						Hours
01/01/2023	SAJ	B210	A106	Call to debtor regarding funding of personal expenses and advances from third parties and issues.		0.30
01/03/2023	SAJ	B120	A107	Call to counsel Minton regarding divorce documents for Vickie to review (no reply).		0.30
	SAJ	B185	A108	Respond to emails from auditors for information regarding consignment agreement through ESG and FSS and send spreadsheet in native format for review.		0.40
	SAJ	B190	A103	Work on mediation report and update briefing for Isgur statement.		1.70
	SAJ	B190	A107	Conference with Conn appeal counsel Pattis regarding status of appeal and appellate points reviewed.		0.80
01/04/2023	SAJ	B160	A107	Review UST questions and request for further information and complete and email to co-counsel with answers, notice to UST that answer will be forwarded.		1.00
	SAJ	B190	A103	Continue to work on mediation report briefing on question of dischargeability (evidentiary burden of proof, default; sanctions denying defenses, etc.).		1.70
01/05/2023	SAJ	B110	A104	Review and comment to co-counsel on Stipulation by FSS regarding deadline for dischargeability and application to Debtor's case.		0.20
	SAJ	B110	A107	Emails with co-counsel regarding meeting yesterday with FSS CRO and debtor.		0.30
	SAJ	B120	A108	Review file for notes and records and contact David Jones to obtain copy of the Missouri Trust (.5); email to co-counsel and response email and further search for documents (.5).		1.00
	SAJ	B160	A107	Begin review of Jason Ruff's email attaching comments and		

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					Hours
				request on J&O and D&G retention applications (.2); emails to co-counsel to coordinate response and not duplicate efforts (.2).	0.40
	SAJ	B160	A103	Work on supplemental declaration in disclosures as needed regarding transactions, assets and work for affiliates.	0.60
	SAJ	B190	A107	Email to Battaglia (.1); co-counsel regarding status of parties to the mediation and schedule for mediator to contact all parties and form of mediation order (.2).	0.30
	SAJ	B190	A104	Review/analyze and comment on Brauner (.2); summarize mediator's concern about "documents" timing before sending mediation letter (.2).	0.40
01/06/2023	SAJ	B210	A106	Email to debtor regarding return to office and meeting to discuss status of all pending matters.	0.30
	SAJ	B160	A107	Email and telephone conference with co-counsel and access to the documents for Missouri Trust funding and related cash use for retainer and work on locating documents.	1.70
	SAJ	B160	A109	Appear for/attend hearings on Kyung and Schwartz.	0.50
01/09/2023	SAJ	B110	A106	Call to client regarding reimbursements of out of pocket connecticut expenses and status per co-counsel.	0.30
	SAJ	B110	A104	Review/analyze and comment on Utility Order.	0.20
	SAJ	B120	A106	Emails and call to debtor (.1); email to co-counsel regarding location of motorhome and security bank lien claim (.1); call to David Jones regarding payment (2).	0.40
	SAJ	B160	A103	Review and comment on proposed edits to order on interim fees.	0.30
01/10/2023	SAJ	B160	A104	Review and comment on first supplemental declaration for employment of J&O (.3); review C&D supplement and issues with payment of fees from retainer first (.1).	0.40
	SAJ	B250	A104	Review/analyze quitclaim circulation on trust assets returned to estate and work on title issue.	0.40
01/11/2023	CRM	B160	A103	Prepare draft of first interim fee application.	1.50
	SAJ	B150	A109	Attend 341 meeting by phone.	0.60
	SAJ	B150	A106	Call to debtor regarding meeting.	0.20
	SAJ	B120	A107	Email to co-counsel regarding motorhome loan paid off and response that debtor began payments (remaining issue-sell motorhome).	0.30

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					Hours
	SAJ	B190	A107	Review and respond to inquiries by Judge Isgur (mediator) for detailed financial information and expectation of completion (.2); email to co-counsel and review and respond and conference with Ray Battaglia regarding FSS response (.2).	0.40
	SAJ	B310	A103	Work on outline of claims objections to the Texas and Conn claims to be filed, including issues raised in appeals and issue of dischargeability.	1.40
01/12/2023	SAJ	B130	A107	Conference with co-counsel regarding location of state bank of Crawford collateral and listing for sale.	0.20
	SAJ	B160	A104	Review/analyze and comment for filing supplement declaration.	0.20
	SAJ	B160	A107	Email and conference with co-counsel regarding Pattis and Reynal applications and retainer deposits paid.	0.30
01/13/2023	SAJ	B110	A109	Plan and attend hearing on motion to reconsider by S&L and Schwartz on FSS and objections filed by Alex Jones.	1.00
	SAJ	B160	A107	Conference with Reynal regarding appeal applicant to represent debtor, Alex Jones (.2); conference regarding entry of order starting appeal time (.1); email to Chris Martin regarding handling Alex Jones appeal (.1).	0.40
	SAJ	B160	A107	Emails to and from co-counsel regarding review and edit Supplement to J&O Application to be employed and declaration.	0.30
	SAJ	B190	A107	Review Rule 2004 Exam to PQPR by Plaintiffs; call to PQPR counsel; email from and to co-counsel.	0.70
	SAJ	B190	A108	Email to and from Judge Isgur regarding mediation and availability of financial documents and discussion with co-counsel.	0.30
01/15/2023	SAJ	B210	A106	Conference with debtor regarding status and issues to discuss.	0.20
01/16/2023	CRM	B160	A103	Continue to work on first interim fee application.	0.90
	SAJ	B160	A107	Conference with Andino Reynal (.2); conference with Chris Martin (.2); conference with Norm Pattis (.2); email to co-counsel regarding retention agreements for Jones estate with each and status and email from co-counsel review and respond (.1).	0.70
	SAJ	B130	A108	Email from Bob Schleizer regarding Missouri Trust and prepaid alimony for 2023 and pull notes to verify.	0.20
	SAJ	B130	A107	Email from and to co-counsel regarding alimony vs prenuptial.	0.40

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February 15, 2023

Account No: 5481-002000M

Statement No: 922213

Bankruptcy

					Hours
01/17/2023	SAJ	B110	A104	Review/analyze email 2019 from creditors committee.	0.20
	SAJ	B110	A107	Conference with co-counsel on all pending matters including schedules and research for Missouri Trust and for certain repayments, etc.	0.70
	SAJ	B160	A108	Review and comment on UST comments to the Blackbriar and Kennerly employment applications.	0.30
01/18/2023	SAJ	B110	A107	Email from Ray Battaglia regarding cash collateral (.1); call regarding salary and cash collateral budget (.2); review witness and exhibit list (.2).	0.50
	SAJ	B160	A107	Email from Chris Martin and reply (.1); email from Andino Reynal and reply regarding appeal retention (.1); call to Reynal (.2); conference with co-counsel regarding retention and review new list of potential affiliate or related parties conflicts and report none (.3); review Sub-V trustee witness and exhibit list (.1).	0.80
	SAJ	B170	A104	Review/analyze exhibit and witness lists from Lee and Schwartz and compare to objections by Jones to both (.2); review Sandy Hook Plaintiffs, UST and Debtor's Exhibits and Witness List (.2); prepare for hearing (.4)	0.80
	SAJ	B185	A104	Review proposed draft order on executory contracts and comment (.2); review witness and exhibit list for Friday hearing on both executory contract (.2).	0.40
01/19/2023	SAJ	B185	A104	Review/analyze amended witness and exhibit lists by Lee and Schwartz.	0.30
01/20/2023	CRM	B160	A109	Appear for/attend 1/20 hearings	1.50
	CRM	B160	A103	Revise first fee app in response to interim compensation order and email same.	1.50
	SAJ	B160	A109	Attend hearing on J&O's Application to be employed and conference with co-counsel.	1.00
	SAJ	B170	A109	Attend hearing on Lee and Schwartz motions to reconsider on the objections of Alex Jones and others.	1.20
01/21/2023	SAJ	B210	A106	Conference with debtor regarding summary of FSS CRO issues.	0.70
01/22/2023	SAJ	B110	A106	Conference with client regarding administrative issues and problems with FSS and issues of the administrative claims this estate has with FSS and CRO and other matters (.5); emails to co-counsel for a Monday zoom or conference call with debtor (.5).	1.00

JONES, ALEX

February 15, 2023

Account No: 5481-002000M

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					Hours
01/23/2023	SAJ	B110	A108	Response to Bloomberg call and request for statements, no statement and refer to co-counsel.	0.20
	SAJ	B110	A107	Emails to co-counsel regarding first MOR and meeting with debtor and timing.	0.30
	SAJ	B160	A103	Work on first monthly fee statement pursuant to Court's Interim Fee Order, including Exhibit A.	0.80
	SAJ	B160	A107	Conference with Andino Reynal and Chris Martin regarding Jones estate appeal lawyer fee agreements (.4); email to co-counsel (.1).	0.50
01/24/2023	SAJ	B210	A106	Notice of debtor's interview and claim by Plaintiffs regarding new cause of action and new claim to damages and conference with debtor.	1.40
	SAJ	B210	A107	Review full details of interview and demand (.6); telephone conference with Andino Reynal and status of record references made in interview (.4).	1.00
	SAJ	B210	A107	Emails to co-counsel regarding potential issues raised by email demand.	0.20
	SAJ	B210	A106	Second conference with debtor about pulled video footage and confirmation.	0.40
	SAJ	B160	A107	Continue issue of fee agreements for Jones appeal (Chris Martin counsel) (.2); conference with Chris Martin and Andino Reynal (.4).	0.60
01/25/2023	SAJ	B110	A104	Review details of first MOR by debtor and email to co-counsel.	0.30
	SAJ	B110	A106	Conference with client regarding MOR and delivery of native format draw spreadsheets and agree no need to attend Thursday meeting.	0.40
	SAJ	B210	A104	Review and comment on issues of failure of McGill to produce projections for sales, expenses in email from co-counsel.	0.30
	SAJ	B210	A107	Conference with Battaglia and email regarding draws of Alex Jones accounting.	0.30
	SAJ	B160	A107	Call and email from Andino Reynal as appeal counsel in Texas cases and email to co-counsel regarding same.	0.30
	SAJ	B160	A104	Review drafts of retention agreements for Reynal and Martin.	0.30
	SAJ	B160	A107	Email and call to client regarding signature on Martin retention agreement.	0.20
	SAJ	B160	A107	Email to co-counsel regarding conversation with Chris Martin to	

JONES, ALEX

February 15, 2023

Account No: 5481-002000M

Statement No: 922213

Bankruptcy

				Hours		
assure proper accounting of \$100k retainer to Martin's firm from only Alex Jones (and not FSS).				0.40		
	SAJ	B190	A107	Email from Battaglia regarding discovery and documents and discovery issues.	0.20	
	SAJ	B190	A107	Email to and from co-counsel and discuss prior mediation privileged documents to Sub-V trustee.	0.20	
01/26/2023	CRM	B160	A103	Final review and revisions to First Monthly Fee Statement from Shelby Jordan and file same and email to all notice parties.	0.50	
	SAJ	B190	A107	Review PQPR discovery issues and privileged documents of FSS or Jones and conference with Lemmon and agree production must include mediation privilege marking.	0.50	
	SAJ	B190	A107	Email to co-counsel regarding marking mediation privilege for production and respond to issues of production by co-counsel.	0.20	
01/27/2023	SAJ	B210	A107	Emails to and from co-counsel regarding meeting on current topics.	0.30	
	SAJ	B170	A103	Work on december fee statement and work on edits to notice of fees and motion for approval of interim fees.	1.10	
01/30/2023	SAJ	B160	A103	Work on monthly fee application and breakdown on fee application for December 2022.	2.00	
01/31/2023	CRM	B160	A103	Revise First Monthly Invoice per co-counsel email on bulk billing (.9); discuss with Shelby Jordan for his revisions (.1).	1.00	
	SAJ	B190	A104	Review emails for production regarding committee and designate those that are privileged (sent from Lemmon's office) and pull and review all Shelby Jordan initiated emails.	1.30	
	SAJ	B210	A108	Call to Rob Dew regarding representation of trust and assistance to handle tax, accounting and reporting issues for Litigation trust.	0.40	
	SAJ	B210	A107	Discuss source of deposits for Info-W Health monthly royalties and need for turnover to trust the balance in trust account.	0.30	
For Current Services Rendered				50.90	28,125.00	

Recapitulation				
<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
SHELBY A. JORDAN	Partners	44.00	\$600.00	\$26,400.00
CRYSTAL MADDEN	Paralegals	6.90	250.00	1,725.00

JONES, ALEX

February 15, 2023

Account No: 5481-002000M
Statement No: 922213

Bankruptcy

01/31/2023	B110	E112	Pacer	102.50
			Total Expenses	102.50
			Total Current Work	28,227.50
			Total Payments	-62,396.65
			Balance Due	<u>\$43,700.00</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	3360.00	102.50
B120	Asset Analysis and Recovery	1200.00	0.00
B130	Asset Disposition	480.00	0.00
B150	Meetings of and Communications with Creditors	480.00	0.00
B160	Fee/Employment Applications	10125.00	0.00
B170	Fee/Employment Objections	1860.00	0.00
B185	Assumption/Rejection of Leases and Contracts	660.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	5220.00	0.00
B100	Administration	<u>23,385.00</u>	<u>102.50</u>
B210	Business Operations	3660.00	0.00
B250	Real Estate	240.00	0.00
B200	Operations	<u>3,900.00</u>	<u>0.00</u>
B310	Claims Administration and Objections	840.00	0.00
B300	Claims and Plan	<u>840.00</u>	<u>0.00</u>

Your trust account #1 balance is

	Opening Balance	\$146,790.16
02/13/2023	Payment of December Fees (80% of fees and 100% of expenses)	<u>-62,396.65</u>
	Closing Balance	<u>\$84,393.51</u>

The entry N/C signifies time spent for which there will be no charge.

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JONES, ALEX
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 March 02, 2023
 Account No: 5481-002000M
 Statement No: 922268

Bankruptcy

PREVIOUS BALANCE

\$43,700.00

Hours

02/01/2023	CRM	B160	A103	Revise exhibit A to first monthly fee statement to show time spent broken down and email amended exhibit A to co-counsel.	1.10
	SAJ	B160	A107	Call from and copy of fee agreement from Andino Reynal.	0.30
	SAJ	B170	A103	Work on edits to December fee statement and amendments.	0.70
	SAJ	B170	A104	Review form and content of Battaglia fee statement.	0.30
	SAJ	B190	A104	Review/analyze and comment on confidentiality order and copy co-counsel.	0.40
02/02/2023	CRM	B160	A103	Additional edits to first monthly statement and december invoice based on change to AO time entry (.5); email to Shelby Jordan and co-counsel with changes to same. (.1).	0.60
	SAJ	B210	A108	Receive and forward to financial consultant the Guadalupe County Tax office notice of address for ranch property for schedules and to change to debtor.	0.20
	SAJ	B160	A106	Email and call regarding Jones signature on Reynal fee agreement and email and call to client to arrange.	0.40
	SAJ	B170	A104	Review/analyze Reynal billings and comment on two-way travel billings and hourly rate.	0.30
	SAJ	B190	A107	Review and respond to Moshenberg email regarding sharing all discovery from the state court litigation and conference with Battaglia and co-counsel on protective order and opposition to disclosures without agreed protective order and review two additional drafts.	0.80
	SAJ	B190	A103	Review and begin comments on Reynal's email summary of response to demand for retraction and telephone conference with Reynal and debtor on how to further respond.	0.80

Bankruptcy

Hours

	SAJ	B190	A107	Review and forward to co-counsel issues with Moshenberg summary of clawback issues after review of attachments.	0.60
02/03/2023	SAJ	B160	A103	Finish and circulate amended December fee statement with further breakdown of codes.	0.60
	SAJ	B160	A104	Review/analyze reynal edited fee agreement and discuss with debtor regarding hourly rate.	0.30
	SAJ	B190	A104	Review emails and draft of new version of protective order.	0.30
02/05/2023	SAJ	B210	A106	Call and email to client regarding status of matters and request for in person meeting.	0.30
	SAJ	B190	A107	Email to co-counsel regarding status of issues and suggestion for an "all hand" conference call with Bob regarding FSS and mediation.	0.20
02/06/2023	SAJ	B210	A106	In office meeting with debtor and review status of all operations and all outstanding operating issues.	0.90
	SAJ	B210	A107	Email to co-counsel for an "all hands" meeting for joint status update.	0.10
	SAJ	B210	A106	Telephone conference with client and Rob Dew regarding status of settlement trust and potential adoption of Alex Jones issues and Plan.	0.80
	SAJ	B210	A108	Telephone call regarding litigation settlement trust and status of assets and scheduling of potential or actual interest in LST assets and need to update all SOS filings including reports for franchise reports and conference regarding getting CPA for LST to prepare the reports and accounting.	0.80
02/07/2023	SAJ	B110	A106	Conference with debtor regarding DIP operations to answer questions and issues of debtor regarding personnel and handling.	0.70
	SAJ	B110	A107	Conference with co-counsel on status of schedules and statements and status of issues raised by debtor in operations and completion of schedules and call to debtor for update after co-counsel call.	1.00
	SAJ	B110	A107	Review FSS response to Ponzer Lift Stay and conference with co-counsel regarding motion for relief from stay by Ponzer and DeLaRosa and Alex Jones response additions.	0.60
	SAJ	B190	A107	Conference call with co-counsel and Judge Isgur regarding status of schedules, disclosures and mediation and pull both Texas Judgement and Connecticut Judgement for memo to debtor and co-counsel on dischargeability (adapt for mediation	

Bankruptcy

statement). Hours
1.00

Date	SAJ	B	A	Description	Hours	
02/08/2023	SAJ	B210	A103	Begin draft on right to indemnity both contractual and statutory for FSS Administrative claim by Alex Jones for unpaid post-petition salary, advances of funds, Conn travel and lodging expenses and employment agreement.	1.60	
	SAJ	B120	A106	Call to debtor regarding schedules and statements and completion of asset listing and conference regarding "opportunity" analysis if value is involved and disclosures.	0.60	
	SAJ	B130	A106	Conference with client and CRO regarding helicopter privileges.	0.30	
	SAJ	B190	A103	Work on memo to co-counsel regarding Heslin (TX) and Lafferty (Conn) judgments and evaluation of appellate grounds (also dischargeability grounds) including trial and submission defects that prevent res judicata, collateral estoppel, issue preclusions etc.	2.10	
02/09/2023	SAJ	B160	A103	Review, edit and approve certificate of no objection.	0.30	
	SAJ	B180	A103	Work on attorneys fees claim for sanction payment and prepare memo on Supreme Court guidance on hourly billing regarding Bankston failure to keep time records (payment funded by debtor) and state court \$1 million dollar payment funded by debtor Alex Jones.	2.80	
	SAJ	B190	A104	Review final draft of confidentiality agreement.	0.60	n/c
	SAJ	B190	A108	Mediation meeting with co-counsel and Judge Isgur.	0.40	
	SAJ	B190	A106	Work on modified transcript and meet at debtors office to begin to pull and review videos for retraction.	2.30	
	SAJ	B190	A104	Review/analyze all parties exhibit and witness list and pull documents important to debtor.	0.40	
02/10/2023	SAJ	B210	A106	Call and conference with debtor regarding give-send-go account administered by Norm Pattis and need for an accounting.	0.40	
	SAJ	B210	A104	Concerns about collection of Youngevity monthly payments and reasons for stop payments and advancement of trust account funds and gather information for co-counsel to schedule and to contact Youngevity CEO or its counsel.	0.50	
	SAJ	B140	A107	Review and respond to co-counsel regarding hearing on lift stay as only preliminary and review exhibit and witness list.	0.20	
	SAJ	B190	A106	Work with debtor and Rob Dew on first full transcript and full videos for response to demand for retraction by Lewis and		

Bankruptcy

					Hours
			recommend viewing all videos from both cameras.		3.80
	SAJ	B190	A107	Review final confidentiality agreement with PQPR removed and email to co-counsel.)	0.30
02/12/2023	SAJ	B210	A106	Call from debtor and forwarding copies of notes from Reynal regarding response to Bankston Demand letter for retraction.	1.50
	SAJ	B210	A103	Begin additional research on how to respond to denial of conversation and how to deal with demand for retraction of non-slandorous statements and prepare initial memo to support outline of details of the proposed written response (and all video response) and circulate V1 and V2 of written response.	2.80
02/13/2023	SAJ	B210	A107	Meeting with co-counsel in debtor's office regarding work on final input to schedules and statements and verify trust account balances and status of issues regarding the 2022 settlement trust termination, winding down and sale of assets.	1.30
	SAJ	B160	A103	Work on January billing statements request and hold back.	0.30
	SAJ	B170	A106	Conference with debtor regarding \$800.00 per hour for litigation and other issues with litigation issues.	0.20
	SAJ	B170	A107	Emails to co-counsel on total fees issues and costs of appeal.	0.20
	SAJ	B210	A106	Meeting with debtor in office regarding download of sequence of events to be reflected in video and video clips from trial and on air.	2.00
	SAJ	B210	A108	Meeting with Rob Dew to begin review of all video clips and to add video clips of second day testimony and work on video cuts and additions and work on titles of each clip at debtor's offices with Rob Dew.	2.60
	SAJ	B210	A103	Work on and circulate V3 and V4 of written response and add additional research.	2.50
	SAJ	B210	A108	Conference with Ben Broocks regarding how to respond to demand of non slanderous statement.	0.50
	SAJ	B210	A104	Obtain copy of complete Piers Morgan interview and view.	1.00
	SAJ	B210	A107	Emails to and from Reynal regarding scope of Bankston's publication of non-clawed back production and HIPPA information.	0.30
	SAJ	B210	A104	Review/analyze witness and exhibit lists for February 14th hearings.	0.20
	SAJ	B210	A107	Review and discuss with co-counsel email from Lemmon on behalf of PQPR production of documents.	0.30

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Hours

02/14/2023	CRM	B160	A103	Prepare second monthly fee notice and send to Shelby for approval before filing.	0.60
	SAJ	B110	A107	Meeting with co-counsel at debtor's office and review final (initial) schedules and statements and edits.	1.10
	SAJ	B210	A107	Conference with Vicki Driver regarding 2022 settlement litigation trust and ownership of its three entities Info-W, Info-Health and Prison Planet TV and review trust documents regarding memo for current treatment of entities.	1.30
	SAJ	B210	A108	Conference with Richard Dale CPA regarding discussing background of trust and assuring all entities of litigation settlement trust have all SOS reports filed or updated for "good standing" certificates and reporting deficiencies and discuss terms of terms of retention and request for retainer.	0.70
	SAJ	B190	A106	Meeting with debtor in his office regarding work on V5 of written response to Bankston demand letter for retraction of Piers Morgan interview statements and conference with Rob Dew to make additions and edits to video sequence, copy V4 to co-counsel including Reynal and request input and edits.	4.00
02/15/2023	CRM	B160	A103	File Second Monthly Fee Statement for January and serve same.	0.20
	SAJ	B190	A106	Telephone conference with debtor and Ray Battaglia regarding Bankston's filing of the text messages of Alex in state court as a violation of the automatic stay to collect a debt.	1.10
	SAJ	B190	A107	Email to Andino Reynal and co-counsel regarding this topic and contents of debtor and Battaglia conversation and pull case law regarding disclosure of non-relevant personal information of a litigant.	1.30
	SAJ	B190	A103	Finish debtor's reply to Bankston's slander demand letter and view video response and conference with Rob Dew and debtor of video issues, meeting in Debtor's office for conference and viewing.	2.60
	SAJ	B320	A107	Conference with Battaglia regarding terms of plan of FSS and dependency on Jones for feasibility and request and review copy of plan with Debtor.	1.30
02/16/2023	SAJ	B110	A104	Review/analyze and comment regarding production of emails and issues of privilege and notice of joint defense privilege preservation to co-counsel.	0.40
	SAJ	B110	A107	Review and forward to co-counsel multiple press requests for information concerning schedules and statements.	0.40

JONES, ALEX

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				Hours	
	SAJ	B110	A106	Receive and forward MOR to client and review MOR with debtor.	0.50
	SAJ	B210	A107	Review motion to revoke FSS status as a subchapter V case and conference with Battaglia.	1.00
	SAJ	B120	A104	Review issues raised by co-counsel for further development in schedule amendments and begin work on trust disclosures.	0.60
	SAJ	B120	A107	Call to Eric Taube regarding work on by estate lawyer that stopped practice.	0.30
	SAJ	B190	A107	Attend zoom meeting with FSS Battaglia and co-counsel regarding mediation and conference with mediator.	0.80
	SAJ	B190	A103	Work on "on air" script and video for retraction demand and call and conference with Rob Dew on edits.	1.60
	SAJ	B190	A107	Call to Reynal and review designation of record on appeal.	0.30
02/17/2023	SAJ	B190	A104	Received and reviewed current version of retraction video.	2.00
	SAJ	B190	A107	Forward web access of retraction video to Reynal and co-counsel for review and comment.	0.30
	SAJ	B190	A106	Trip to debtor offices and view new edits to retraction video and conference with client and Rob Dew.	1.00
02/18/2023	SAJ	B190	A106	Email and call to Rob Dew regarding addition of statement to clarification/retraction video and call to debtor.	0.70
	SAJ	B190	A104	Review/analyze addition and approve statement for clarification and retraction video.	0.70
02/20/2023	SAJ	B190	A108	Call and conversation with Rob Dew regarding edits and final changes to retraction demand video and approve and agree to publish.	0.80
02/21/2023	SAJ	B110	A107	Conference with Norm Pattis regarding accounting corrections for "give-send-go" donation account and post petition transfer from account to IOLTA of Pattis and email to counsel.	0.40
	SAJ	B210	A106	Review lengthy email collection forwarded by debtor's ex-wife and discuss with debtor and co-counsel to determine not to respond.	0.50
	SAJ	B190	A103	Work on final draft of video edits and emails and call to editing crew.	2.50
	SAJ	B190	A106	Call to debtor and circulate final draft to all debtor counsel for review and serve final draft of notice of retraction to Bankston.	0.50

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					Hours	
	SAJ	B190	A108	Prepare and attend conference call with mediator Isgur and all debtor related counsel.	0.80	
02/22/2023	SAJ	B110	A104	Review and comment on motion to strike sub chapter V designation in FSS chapter 11.	0.40	
	SAJ	B190	A108	Follow up with obtaining all locations of retraction and a copy of the full show including retraction and call to Rob Dew.	0.40	
02/23/2023	SAJ	B110	A104	Review summary of amendment to schedules and statement topics and comment and review communication to mediator regarding same.	0.70	
	SAJ	B210	A109	Attend partial 341 meeting and UST questioning and email to co-counsel.	1.00	
	SAJ	B410	A106	Call from client and discuss 341 meeting and issues.	0.40	
02/24/2023	SAJ	B110	A108	Coordinate Judge Nelms and Judge Schmidt advances and 1099 to include their 1099 to Matt Okin.	0.20	n/c
	SAJ	B110	A104	Verify that final retraction was published an no response yet from Piers Morgan for show publication and verify receipt by Bankston (no response to date).	0.60	
	SAJ	B160	A104	Review all witness and exhibit lists for hearing to determine exhibits (none) and objections (none).	0.30	
	SAJ	B190	A107	Receive and review 2004 exam of Alex Jones and email to co-counsel.	0.30	
02/26/2023	SAJ	B210	A106	Call from debtor regarding operations.	0.20	
	SAJ	B210	A106	Call to debtor operations and 341 meeting.	0.30	
	SAJ	B210	A107	Call to co-counsel and leave message.	0.10	
02/27/2023	SAJ	B210	A106	Call to co-counsel and call to client regarding status and discussion with co-counsel regarding 341 meeting and debtor's responses and matters to be done post 341.	0.40	
	SAJ	B190	A103	Work on discharge issues of Connecticut claims and update memo.	2.00	
02/28/2023	SAJ	B110	A109	Attend hearing on appeal lawyers retention application (Reynal and Martin).	0.40	
	SAJ	B110	A107	Call and conference with co-counsel regarding status of all pending matters.	0.30	
	SAJ	B110	A106	Call to debtor for scheduling.	0.20	

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Account No:
Statement No:5481-002000M
922268

				Hours	
SAJ	B210	A108	Conference with Rob Dew and co-counsel regarding how to determine the status of the 2022 litigation trust now in winding down phase with remaining debt in InfoW (not related to the waived debt of Sandy Hook Plaintiffs) and working on memo summary.	1.70	
SAJ	B190	A103	Work on memo on Connecticut and Texas discharge of debts to supplement mediation statement and email to co-counsel.	2.00	
			For Current Services Rendered	86.80	51,205.00
			Total Non-billable Hours	1.80	

<u>Timekeeper</u>		<u>Recapitulation</u>		<u>Hours</u>	<u>Rate</u>	<u>Total</u>
SHELBY A. JORDAN		<u>Title</u>				
CHRYSTAL MADDEN		Partners		84.30	\$600.00	\$50,580.00
		Paralegals		2.50	250.00	625.00

02/28/2023	B110	E106	Online research - Lexis			
02/28/2023	B110	E106	Online research - PACER			2.04
			Total Expenses			20.40
						22.44
			Total Current Work			51,227.44
			Total Payments			-22,602.50
			Balance Due			<u>\$72,324.94</u>

Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
3110 Case Administration		
3120 Asset Analysis and Recovery	4620.00	22.44
3130 Asset Disposition	900.00	0.00
3140 Relief from Stay/Adequate Protection Proceedings	180.00	0.00
3160 Fee/Employment Applications	120.00	0.00
3170 Fee/Employment Objections	2125.00	0.00
3180 Avoidance Action Analysis	1020.00	0.00
3190 Other Contested Matters (excluding assumption/rejection motions)	1680.00	0.00
100 Administration	23460.00	0.00
	34,105.00	22.44
210 Business Operations		
200 Operations	16080.00	0.00
	16,080.00	0.00
320 Plan and Disclosure Statement (including Business Plan)		
300 Claims and Plan	780.00	0.00
	780.00	0.00
410 General Bankruptcy Advice/Opinions	240.00	0.00

JONES, ALEX

March 02, 2023

Account No: 5481-002000M
Statement No: 922268

Bankruptcy

		<u>Fees</u>	<u>Expenses</u>
B400	Bankruptcy-Related Advice	240.00	0.00

Your trust account #1 balance is

Opening Balance	\$84,393.51
3/10/23 Payment of January Fees (80% of fees and 100% of expenses)	-\$22,602.50
Closing Balance	\$61,791.01

The entry N/C signifies time spent for which there will be no charge.

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JONES, ALEX
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 April 06, 2023
 Account No: 5481-002000M
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Bankruptcy

PREVIOUS BALANCE

\$72,324.94

Hours

03/01/2023	SAJ	B210	A103	Review financial statements of FSS from August 1, 2022 to January 31, 2023 and prepare memo.	0.80
	SAJ	B210	A106	Call to debtor and conference regarding FSS financial statements.	0.20
	SAJ	B210	A107	Email and respond to co-counsel regarding communication with Jones and status of his response.	0.20
	SAJ	B190	A103	Work on memo regarding dischargeability of Texas and Conn Plaintiffs and circulate drafts to debtor and co-counsel.	2.80
03/02/2023	SAJ	B110	A108	Follow up on note for Guadalupe Tax office notice of recording of quitclaim deed and need to change of address to debtor.	0.20
	SAJ	B120	A108	Receive and begin review of email from Richard Reeves sending per my request relevant documents, including emails, January 13 notice of cancellation of membership status and other related documents.	1.00
	SAJ	B120	A108	Call to Reeves for explanation and beginning chronology and how to find missing information.	0.40
	SAJ	B160	A103	Finish modification to Second Monthly Fee Statement to conform February filings.	0.20
	SAJ	B190	A107	Conference with Battaglia regarding Avi Moshenbourg threat to share or make public all documents produced by FSS in underlying state court case and response including response regarding new confidentiality order and publication subject thereto per co-counsel's email notice of intent to be bound and email response to Moshenbourg to notice.	1.00
	SAJ	B190	A106	Email to debtor regarding response to retraction and status of Piers Morgan agreement to air retraction.	0.20

JONES, ALEX

Account No: 5481-002000M
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Bankruptcy

					Hours	
	SAJ	B240	A106	Review with debtor new POC by IRS of \$558,984.64 and email to Bob Schleizer and co-counsel.	0.30	
	AO	B190	A104	Review memo circulated by Shelby Jordan regarding dischargeability and conference regarding same.	1.00	
03/03/2023	SAJ	B120	A103	Receive data dump from Reeves and begin drafting demand to Youngevity recovery of royalty payments and response to suspension letter and conference with Richard Reeves regarding documents and emails and chronology.	2.20	
	SAJ	B170	A104	Review/analyze for confidentiality the Appellee UST designations on appeal by Schwartz and Lee and compare to S&L Appellate designations.	0.30	
03/04/2023	SAJ	B120	A103	Work on documents for Youngevity claims review and prepare chronology.	1.10	
03/05/2023	SAJ	B120	A103	Work on documents for Youngevity claims including emails and email to Richard Reeves and conference with debtor.	1.40	
03/06/2023	CRM	B160	A103	Prepare draft of third monthly fee statement.	0.70	
	SAJ	B110	A106	Call from debtor regarding current operations and FSS financial statements (6 months P&L).	0.70	
	SAJ	B120	A104	Continue to review documents and email correspondence.	1.30	
	SAJ	B120	A107	Call to co-counsel and leave message.	0.10	n/c
	SAJ	B190	A107	Calls on De La Rosa lift stay.	0.20	n/c
	SAJ	B190	A104	Review exhibit lists of hearing on motion to compel for exhibits and expected witnesses.	0.40	
	SAJ	B190	A103	Work on details of research on discharge issue to add back to memo sent to co-counsel.	0.60	
	SAJ	B140	A107	Call to Martin, Reynal, co-counsel regarding unable to attend telephone conference set today and issues of additional trials.	0.30	
	SAJ	B140	A106	Call from debtor about lift stay and attendance on call.	0.30	
03/07/2023	SAJ	B110	A104	Receive and review UST's response to motion to revoke sub V status of FSS.	0.40	
	SAJ	B120	A108	Meeting and telephone call with Richard Reeves and review batched emails on issue of Youngevity and review background facts and financial status of Youngevity and research quarterly financial report.	2.70	
	SAJ	B120	A106	Meeting with debtor and co-counsel at debtors office and		

Bankruptcy

					Hours
			meeting with David Jones on history, chronology and approach to recovery of distributions due debtor from Youngevity.		1.00
	SAJ	B140	A107	Conference with co-counsel and Reynal regarding stay relief and intention to set trial date and issues of additional trial with Chris Martin.	0.30
	SAJ	B140	A106	Conference with debtor regarding conference with co-counsel and Reynal.	0.20
03/08/2023	SAJ	B210	A109	Prepare and attend hearing on motion to compel amendment to schedules.	0.80
	SAJ	B120	A103	Work on demand letter to Youngevity and look for any signed document and amendments.	1.20
	SAJ	B120	A106	Meeting with debtor regarding Youngevity.	0.40
	SAJ	B320	A104	Begin review of FSS Plan filed today and conference with Battaglia regarding Plan and issues of Sub V case designation and objections.	1.00
	SAJ	B320	A104	Review and send current published brief on issues of corporate discharge under 523.	0.70
03/09/2023	SAJ	B210	A106	Send debtor copy of FSS plan as requested and brief summary of questions of Sub Ch V.	0.50
	SAJ	B410	A106	Conference with Debtor regarding implications of January 6 evidence and issues regarding debtor.	0.60
	SAJ	B410	A107	Conference with Norm Pattis regarding January 6 evidence and status of debtor's risk of involvement.	0.30
	SAJ	B120	A107	Telephone conference with co-counsel regarding status of Youngevity (both financial and allegations of breach) and work on response and demand for payment.	0.70
	SAJ	B140	A107	Conference with co-counsel on status of stay relief and potential for another trial pre-mediation.	0.30
03/10/2023	SAJ	B160	A107	Email explanation to Reynal on fee applications and monthly hold back along with copy of Court's order.	0.30
	SAJ	B160	A103	Finish for circulation 3rd monthly fee statement.	0.30
	SAJ	B185	A103	Review draft of pleading and work on rejection of executory contract motion regarding elevated solutions two contracts.	0.30
	SAJ	B185	A106	Call to debtor and call and message to ESG.	0.20
	SAJ	B185	A107	Email to Bob.	0.10

JONES, ALEX

April 06, 2023

Account No: 5481-002000M
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Bankruptcy

					Hours
	SAJ	B185	A104	Research contract granting right to represent celebrity and granting interest in the whisky celebrity contract and rejection.	0.40
	SAJ	B190	A107	Emails from and to Reynal regarding agreement with Ponzer defendants on lift stay and status of UCC and Sub V to verify.	2.00
	SAJ	B190	A107	Call to Battaglia regarding response to plaintiffs to revoke the Sub V election and review motion and response and discuss with debtor.	0.60
03/13/2023	CRM	B160	A103	Final review of third monthly fee statement and file and serve same.	0.50
	SAJ	B210	A106	Conference with debtor regarding status of notice to court of preliminary issues of conduct of Plaintiffs, status of mediation and upcoming hearings.	0.40
	SAJ	B160	A103	Work on application and Exhibit B of Norm Pattis and emails to co-counsel staff and work on fee agreement signed copies with Alex Jones and FSS.	2.30
	SAJ	B190	A104	Begin review and analysis of Texas and Connecticut Adversary to determine dischargeability of sandy hook plaintiffs claims.	2.10
03/14/2023	SAJ	B160	A107	Call to Pattis regarding edits and location of signed fee agreement with debtor Jones and terms of engagement.	0.40
	SAJ	B160	A107	Review Tenco Capital LLC comment and forward to co-counsel.	0.20
	SAJ	B190	A104	Continue to review and analysis of Texas and Connecticut Adversary to determine dischargeability of Sandy Hook Plaintiffs claims.	1.20
03/16/2023	CRM	B190	A103	Prepare notices of appearances in all new adversary matters and file same.	0.50
	SAJ	B185	A103	Review and begin edits to motion to reject ESG executory contracts, conference with debtor, call to Joey D and email to Bob.	1.00
	SAJ	B190	A104	Continue to review and comment on objection to dischargeability and conference with debtor regarding same.	1.30
03/17/2023	SAJ	B110	A106	Conference with client regarding McGill questions and issues and decision to reject executory contracts and issues raised by Plaintiff in removal of the Sub-V.	0.40
	SAJ	B185	A107	Emails from and to Bob S/Harold regarding rejection of executory contracts of ESG.	0.20

JONES, ALEX

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Bankruptcy

					Hours
	SAJ	B185	A106	Email to client and email from co-counsel and telephone conference with ESG and debtor regarding rejection of executory contracts of ESG..	0.20
	SAJ	B190	A103	Work on pleading summary and analysis regarding dischargeability.	1.00
	SAJ	B190	A104	Receipt and review and compare new 2004 exam to FSS and Alex Jones served by Freeman filed under seal and circulate.	0.30
	SAJ	B190	A104	Receipt and review notice of 2004 exam to ESG and forward and comment.	0.20
	SAJ	B190	A106	Conference with client regarding explanation of suits filed by Tex and NY and defenses and potential new trial.	0.60
03/18/2023	SAJ	B190	A103	Work on TX Plaintiffs objection to dischargeability pleading summary and discharge defense research issues.	2.10
03/19/2023	SAJ	B110	A106	Call from debtor regarding scheduling meeting with co-counsel and prepare list of issues and topics for conference.	0.40
03/20/2023	SAJ	B110	A107	Email to co-counsel with list of Jones questions and scheduling meeting on issues.	0.20
	SAJ	B210	A105	Conference with client regarding current strategy list of pending matters including EGS rejection of contracts and operations, nature of objections to discharge and how procedures work and appellate status.	0.60
03/21/2023	CRM	B120	A107	Email from co-counsel regarding current deed for Cedar Creek and pull land records to run search for same to locate and email to co-counsel.	0.60
	SAJ	B190	A107	Review co-counsel email regarding production of documents to UCC and basis of redaction or motion AEO.	0.20
	SAJ	B190	A103	Work on notes and outline to both TX and Conn Plaintiffs objection to dischargeability.	1.10
03/22/2023	SAJ	B190	A106	Call from Debtor regarding strategy issues list add Youngevity.	0.30
	SAJ	B190	A107	Call from Norm Pattis regarding debtor issues in Jan 6th subpoena possibility.	0.20
03/24/2023	SAJ	B210	A106	Call from debtor and create list of issues and topics debtor wants to have an "all hand" conference on and email to co-counsel regarding next Tuesday meeting.	1.00
	SAJ	B120	A103	Work on Youngevity demand letter to forward to debtor or names and email Harmon for CEO email or correct mailing address.	1.30

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Bankruptcy

					Hours
03/25/2023	CRM	B120	A108	Various emails with BlackBriar regarding wires and search and send all information for same to Shelby Jordan, co-counsel and BlackBriar.	0.50
03/26/2023	SAJ	B210	A106	Conference with debtor and co-counsel and work on Youngevity demand letter.	1.00
03/27/2023	SAJ	B210	A109	Prepare and attend hearings on cash collateral, sub chapter V revocation, status of discovery and issues regarding operations and Alex relationship with Mountain Way.	3.20
	SAJ	B210	A106	Four telephone calls with debtor.	0.70
	SAJ	B210	A107	Emails to co-counsel and debtor regarding mountain way and actual facts and prepare memo to co-counsel and conference with Ray Battaglia for September and October invoices.	1.10
	SAJ	B160	A107	Get fee agreements from Norm Pattis for execution by Jones.	0.30
03/28/2023	SAJ	B110	A104	review past notes and emails to determine if any dealt with Mount Way or McGill and MW.	0.50
	SAJ	B110	A104	Review Mountain Way invoices paid by FSS showing "Alex Jones Show... promoting Satellite Phone and related products" marked paid and review 11 other similar invoices all marked paid.	1.00
	SAJ	B110	A107	Conference with Battaglia and with co-counsel regarding Mountain Way.	0.40
	SAJ	B110	A104	Review draft of SOFA and Schedules.	0.70
	SAJ	B210	A107	Conference with co-counsel and debtor regarding mountain way and notice given on multiple occasions to McGill.	0.70
	SAJ	B120	A103	Prepare notice demand letter to Youngevity for payment of royalties due regarding suspended contract payments and add internet research sites and circulate to debtor and co-counsel.	2.50
	SAJ	B120	A107	Emails from RJ Shannon and co-counsel and emails to both regarding IP transfers.	0.40
	SAJ	B190	A103	Work on full summaries for response to motion regarding dischargeability and forward brief summary to co-counsel and set up conference call regarding dischargeability.	2.10
	SAJ	B190	A107	Review email from Chris Davis regarding team meeting before conference with Plaintiffs counsel on Friday.	0.30
03/29/2023	SAJ	B120	A107	Discussion with co-counsel regarding value of the 2022 litigation settlement trust and issues with assets, status,	

JONES, ALEX

April 06, 2023

Account No: 5481-002000M
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Bankruptcy

			ownership and status.	Hours 0.70		
	SAJ	B110	A107	Work on issues of Mountain Way and emails regarding Jess Schulze notice of Mountain Way and emails to co-counsel.	0.50	
	SAJ	B110	A107	Continue to review issues with Schedules and SOFA and comments from Porter UCC counsel and emails to co-counsel.	0.80	
	SAJ	B190	A104	Review POC docket and determine issues of objections to Plaintiffs claims and memo along with memo on claims estimate where no res judicate applies.	1.90	
03/30/2023	CRM	B150	A109	Attend continued 341 meeting and take notes for Shelby Jordan.	0.90	
	SAJ	B120	A103	Forward updated final draft of Youngevity demand letter to co-counsel after conference with Reese and debtor.	0.80	
03/31/2023	SAJ	B110	A107	Review email from Bob Schleizer regarding amended schedules and issue raised by Porter (comment) and co-counsel letter regarding value of trust.	0.40	
	SAJ	B110	A104	Review amended schedule A/B for completeness.	0.30	
	SAJ	B110	A104	Review Porter issues of non-cooperation with debtor counsel and comment.	0.30	
	SAJ	B160	A108	Email to Roger Borgelt regarding 2022 litigation trust representation and email to Rob Dew and Richard Dale to assure SOS and certificates of authority are being maintained and counsel is assisting Dew.	0.60	
	SAJ	B190	A107	Conference call with dischargeability team to review Monday and Tuesday matters and work on organization of research for team call.	3.10	
	SAJ	B190	A107	Attend conference call with Plaintiffs counsel regarding proposed scheduling order.	1.00	
			For Current Services Rendered	80.40	46,820.00	
			Total Non-billable Hours	0.30		

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
SHELBY A. JORDAN	Partners	75.70	\$600.00	\$45,420.00
ANTONIO ORTIZ	Partners	1.00	475.00	475.00
CHRYSTAL MADDEN	Paralegals	3.70	250.00	925.00

03/31/2023	B110	E106	Pacer	120.30
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JONES, ALEX

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Bankruptcy

Total Expenses	120.30
Total Current Work	46,940.30
Total Payments	-40,986.44
Balance Due	<u>\$78,278.80</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	4320.00	120.30
B120	Asset Analysis and Recovery	11735.00	0.00
B140	Relief from Stay/Adequate Protection Proceedings	840.00	0.00
B150	Meetings of and Communications with Creditors	225.00	0.00
B160	Fee/Employment Applications	3060.00	0.00
B170	Fee/Employment Objections	180.00	0.00
B185	Assumption/Rejection of Leases and Contracts	1440.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	16560.00	0.00
B100	Administration	<u>38,360.00</u>	<u>120.30</u>
B210	Business Operations	6720.00	0.00
B240	Tax Issues	180.00	0.00
B200	Operations	<u>6,900.00</u>	<u>0.00</u>
B320	Plan and Discosure Statement (including Business Plan)	1020.00	0.00
B300	Claims and Plan	<u>1,020.00</u>	<u>0.00</u>
B410	General Bankruptcy Advice/Opinions	540.00	0.00
B400	Bankruptcy-Related Advice	<u>540.00</u>	<u>0.00</u>

Your trust account #1 balance is

	Opening Balance	\$84,393.51
03/10/2023	Payment of January Fees (80% of fees and 100% of expenses)	-22,602.50
04/04/2023	Payment of February Fees (80% of fees and 100% of expenses)	<u>-40,986.44</u>
	Closing Balance	<u>\$20,804.57</u>

The entry N/C signifies time spent for which there will be no charge.

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 May 04, 2023
 Account No: 5481-002000M
 Statement No: 922405

Bankruptcy

PREVIOUS BALANCE						\$78,278.80
					Hours	
04/02/2023	SAJ	B110	A106	Call from client and follow up conference call with client and Bob S regarding issues of operations and dealings with McGill on Mountain Way.	2.00	
	SAJ	B190	A104	Receive and review witness and exhibit lists for April 4 hearings and review order denying sub-chapter V motion to strike.	0.40	
04/03/2023	SAJ	B110	A104	Review/analyze all SOS filings by Richard Dale for affiliate entities and litigation trust entities and forward to Driver and conference with Richard Dale.	1.00	
	SAJ	B110	A107	Conference with Driver and client regarding Mountain way.	1.00	
	SAJ	B110	A103	Work on issues of independent income and employment agreement.	0.70	
	SAJ	B210	A104	Review/analyze emails regarding Driver and Porter issues of disclosures and response and comment.	0.40	
	SAJ	B210	A106	Forward FSS financial statement filed to client and call from client.	0.60	
04/04/2023	CRM	B190	A109	Attend scheduling conference for Adversaries.	0.50	
	CRM	B150	A109	Attend continued 341 meeting for Shelby Jordan and take notes.	1.50	
	SAJ	B110	A109	Attend adjourned 341 meeting and conference with client and co-counsel at conclusion.	2.20	
	SAJ	B210	A104	Review/analyze Battaglia billings and attorneys fees request.	0.20	
	SAJ	B410	A106	Conference with client regarding issues of disclosures by Porter and issues of Mountain Way.	0.40	
	SAJ	B420	A106	Review SubCh V report in detail, obtain unredacted copy and		

JONES, ALEX

May 04, 2023

Account No: 5481-002000M
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Bankruptcy

					Hours
				conference with client.	2.30
04/05/2023	SAJ	B110	A106	Conference with client regarding withdrawal by McGill of product sales and reduced sales of Infowars cite products and go online to verify that substantial products have ben taken down and bitcoin contributions discontinued.	1.80
	SAJ	B110	A108	Call to Bob S, co-counsel regarding report of meeting with McGill and issues of SubV trustees decision to shut down bitcoin donations.	0.40
	SAJ	B190	A102	Work on responsive research and strategy for dischargeability team and research to support strategy regarding dischargeability.	1.30
	SAJ	B185	A106	Conference with Jones regarding ESG rejection motion.	0.40
04/11/2023	CRM	B160	A103	Prepare fourth monthly fee statement and email to Shelby Jordan for approval.	0.80
04/17/2023	SAJ	B190	A107	Pull stalled email from outbox, update and send on dischargeability.	1.40
	AO	B110	A104	Review memo on dischargeability circulated by Shelby Jordan.	0.80
04/20/2023	SAJ	B185	A104	Review Driver email and review attached draft motion to reject ESG and related executory contracts.	1.00
04/26/2023	CRM	B160	A103	Final review of Fourth Monthly Fee Statement and file and serve same.	0.50
	SAJ	B160	A107	Work on finding Pattis fee agreement and forward to Driver.	0.40
04/27/2023	SAJ	B210	A104	Review FSS status of salary and FSS status of funds to pay Pattis share of appellate fees and conference with Pattis.	1.00
	SAJ	B120	A107	Review agreement regarding Crypto contribution sharing and call to co-counsel.	0.20
	SAJ	B170	A104	Review motion to compromise and witness and exhibit list regarding S&L and Schwartz for hearing.	0.50
04/28/2023	CRM	B190	A109	Attend cash collateral hearing and motion to approve settlement hearing.	1.50
	SAJ	B110	A104	Review motion current financial statement of FSS and employment agreement and issues of salary vs income generated to FSS and income from independent sources.	0.80
	SAJ	B110	A104	Review and comment on agreement on donations and crypto accounts at 50/50 and motion to approve stipulation.	0.60

JONES, ALEX

May 04, 2023

Account No: 5481-002000M
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Bankruptcy

				Hours		
	SAJ	B170	A109	Attend hearing on objection filed by AEJ to retention/payment of S&L and Schwartz attorneys fees and hearing on cash collateral.	1.60	
04/29/2023	SAJ	B110	A107	Call to co-counsel and request call back and prepare outline of issues.	0.30	
	SAJ	B210	A107	Call to Andino Reynal and Norm Pattis regarding appeal, payment and status of both.	0.40	
				For Current Services Rendered	28.90	15,560.00

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
SHELBY A. JORDAN	Partners	23.30	\$600.00	\$13,980.00
ANTONIO ORTIZ	Partners	0.80	475.00	380.00
CHRYSTAL MADDEN	Paralegals	4.80	250.00	1,200.00

Total Current Work 15,560.00

Balance Due \$93,838.80Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	6860.00	0.00
B120	Asset Analysis and Recovery	120.00	0.00
B150	Meetings of and Communications with Creditors	375.00	0.00
B160	Fee/Employment Applications	565.00	0.00
B170	Fee/Employment Objections	1260.00	0.00
B185	Assumption/Rejection of Leases and Contracts	840.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	2360.00	0.00
B100	Administration	12,380.00	0.00
B210	Business Operations	1560.00	0.00
B200	Operations	1,560.00	0.00
B410	General Bankruptcy Advice/Opinions	240.00	0.00
B420	Restructurings	1380.00	0.00
B400	Bankruptcy-Related Advice	1,620.00	0.00

Your trust account #1 balance is

Opening Balance	\$20,804.57
Closing Balance	\$20,804.57

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JONES, ALEX
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 May 18, 2023
 Account No: 5481-002000M
 Statement No: 922449

Bankruptcy

PREVIOUS BALANCE

\$93,838.80

					Hours
05/01/2023	SAJ	B110	A104	Pull current docket sheet and review for update memo to client.	0.60
	SAJ	B110	A107	Call to co-counsel for client list of issues.	0.70
	SAJ	B160	A107	Review status of application with Norm Pattis and Ray Battaglia and work on obtaining signed FSS retention agreement.	1.10
	SAJ	B190	A107	Call to co-counsel regarding status of mediation and call to Battaglia regarding mediation.	0.30
05/02/2023	SAJ	B210	A104	Work on discovery issues for co-counsel response to committee 2004 notice.	0.60
	SAJ	B210	A107	Review draft of employment agreement and conference with Battaglia regarding salary concern and FSS position.	2.10
	SAJ	B190	A104	Begin review and comment on Answer to Connecticut suit and claim of non-dischargeability (request Texas draft).	2.10
05/03/2023	SAJ	B185	A104	Review revised draft of 2004 notice and executory contract rejections (ESG, Tate) and conference with client regarding same.	0.50
	SAJ	B190	A104	Continue to review and comment on answer to Connecticut and Texas suit and claim of non-dischargeability.	2.00
	SAJ	B190	A102	Work on additional research regarding claim of non-dischargeability.	1.30
05/04/2023	SAJ	B190	A103	Work on discovery assistance regarding documents for production from email with client and prepare a privilege log of all email correspondence.	2.00
	SAJ	B190	A104	Continue review of Texas Suit and claim of non-dischargeability and work on additional research.	2.20

Bankruptcy

					Hours	
	SAJ	B190	A104	Request draft of Texas Plaintiffs answer.	0.20	n/c
05/05/2023	CRM	B160	A103	Begin draft of First Interim Fee Application.	4.00	
	SAJ	B110	A103	Work on proposed employment agreement with FSS to replace prior employment agreement and conference with client regarding agreement and salary issues.	2.30	
	SAJ	B110	A107	Call to co-counsel regarding list of items that debtor wants to discuss.	0.20	
	SAJ	B160	A103	Work on first interim fee application for disbursement of hold backs and proposed order.	2.00	
	SAJ	B190	A104	Finish initial review and comment on Answer to Connecticut and Texas suite and claim of non-dischargeability.	0.60	
	SAJ	B190	A102	Work on additional research and circulate.	0.70	
	SAJ	B190	A104	Review filed answer to Texas complaint.	1.70	
05/08/2023	CRM	B160	A103	Continue to work on First Interim Fee Application and send to Shelby Jordan for revisions.	1.30	
	SAJ	B110	A106	Email to debtor and co-counsel and conference with debtor regarding agenda of items debtor wants to discuss and issues raised by co-counsel including employment agreement, platinum money release 1776 coin funds and circulate partial agenda for conference.	1.70	
	SAJ	B110	A104	Review issues raised by UCC regarding Tate and celebrity endorsements and disclosures and conference with co-counsel.	0.40	
	SAJ	B160	A103	Continue to work on first interim application of holdback and interim approval of fees and email to co-counsel.	1.00	
	SAJ	B190	A104	Review 2004 Exam notices of Security State Bank and Michael Zimerman and Charles Cicack.	0.40	
05/09/2023	SAJ	B110	A107	Conference with Pattis regarding potential plan issues and third party questions.	0.40	
	SAJ	B110	A103	Work on items agenda for conference on report and court's request for status conference and circulate V1 draft of agenda.	1.00	
05/10/2023	SAJ	B110	A106	Conference with client regarding new email address and prepare and complete list of all questions and topics over past 90 days and ask client to pare down for the purpose of meeting with co-counsel and financial advisors.	1.00	
05/11/2023	SAJ	B110	A107	Call to Andino Reynal and Norm Pattis regarding return calls on		

May 18, 2023

JONES, ALEX

Account No: 5481-002000M
Statement No: 922449

Bankruptcy

status of appeals. Hours
0.40

SAJ B110 A107 Email from co-counsel regarding circulated list and await call from financial advisor and reply. 0.30

SAJ B180 A107 Email and conference with Pattis regarding GiveSendGo balances due to Debtor's estate (attorneys fees contributions) and emails from and to Pattis. 0.30

SAJ B190 A104 Review Cicack 2004 notice and check if zoom is available. 0.40

05/12/2023 SAJ B110 A106 Call with client regarding new list and how to pare down his topics for strategy discussion. 0.80

SAJ B110 A106 Conference with client and financial advisor and planning for weekend. 0.70

SAJ B190 A104 Begin review of Connecticut and Texas Plaintiffs MSJ. 2.80

SAJ B190 A107 Email to co-counsel regarding Plaintiffs offer and status of mediation based on offer and request copy and conference with Ray Battaglia. 0.70

05/14/2023 SAJ B110 A106 Call from client regarding status of hearing with court and issues to be addressed, status of October trial and staffing, status of legal fees outpacing income now being dedicated to FSS. 0.70

SAJ B110 A107 Email to co-counsel about client concerns and request update. 0.50

05/15/2023 CRM B160 A103 Revise First Fee Application with updated numbers. 0.50

SAJ B110 A107 Call to Andino Reynal and Norm Pattis regarding return calls on status of appeals. 0.40

SAJ B110 A107 Email from co-counsel regarding circulated list and await call from financial advisor, reply. 0.20

SAJ B110 A107 Email to co-counsel regarding Sunday conversation with client and outline of conference topics. 0.40

SAJ B190 A107 Discovery of settlement offer not sent to Shelby Jordan and discovery of mediation conference with Isgur not discussed with Shelby Jordan and request to co-counsel of copies and summary and conference with FSS counsel. 1.00

For Current Services Rendered 44.30 24,550.00
Total Non-billable Hours 0.20

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
SHELBY A. JORDAN	Partners	38.50	\$600.00	\$23,100.00

JONES, ALEX

May 18, 2023

Account No:

5481-002000M

Statement No:

922449

Bankruptcy

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
CHRYSTAL MADDEN	Paralegals	5.80	250.00	1,450.00

05/15/2023	B110	E106	Pacer	315.70
			Total Expenses	315.70
			Total Current Work	24,865.70
			Total Payments	-20,804.57
			Balance Due	<u>\$97,899.93</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	7620.00	315.70
B160	Fee/Employment Applications	3910.00	0.00
B180	Avoidance Action Analysis	180.00	0.00
B185	Assumption/Rejection of Leases and Contracts	300.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	10920.00	0.00
B100	Administration	22,930.00	315.70
B210	Business Operations	1620.00	0.00
B200	Operations	1,620.00	0.00

Your trust account #1 balance is

	Opening Balance	\$20,804.57
05/15/2023	Payment of March Fees (partial of 80% of fees and 100% of expenses)	-20,804.57
05/17/2023	GiveSendGo Payment from Pattis	67,760.70
05/18/2023	Wire to DIP account for Jones of GiveSendGo Payment	-67,760.70
	Closing Balance	<u>\$0.00</u>

The entry N/C signifies time spent for which there will be no charge.